

1 During the meeting, KEITH JACKSON told UCE 4599 he needed to talk to SENATOR YEE,  
2 a.k.a. Uncle Leland, about brokering a meeting with an individual who trafficked in  
3 weapons. According to KEITH JACKSON, the arms trafficker was attempting to ship weapons to the  
4 Philippines because there was an ongoing war between an unidentified Philippine Muslim rebel group  
5 and the Philippine Government. KEITH JACKSON told UCE 4599 "That's a good one for us" and  
6 further added "I will make it happen." UCE 4599 stated he believed SENATOR YEE was all about  
7 taking money from people and not delivering on his promises. SULLIVAN told UCE 4599 he had been  
8 trafficking narcotics for six to seven years. According to SULLIVAN, BRANDON JACKSON, was an  
9 "intermediary" who acted on SULLIVAN's behalf.  
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11 On October 23, 2013, two UCEs arranged a meeting with GARY CHEN in Everett,  
12 Massachusetts to conduct a money laundering operation. At the meeting location, GARY CHEN arrived  
13 in a GMC SUV with Massachusetts plates. GARY CHEN retrieved a plastic bag from the vehicle and  
14 walked towards the UCEs vehicle. CHEN sat in the front passenger seat of the UCEs vehicle. CHEN  
15 told the UCEs that the plastic bag contained \$135,000 in bundles of cash. CHEN described that he was  
16 from San Francisco. The cash total was later confirmed to be \$134,145.  
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18 On October 24, 2013, UCE 4599 arranged to meet with LAI at a coffee shop in San  
19 Francisco. The purpose of the meeting was to provide LAI with laundered drug proceeds to conclude  
20 the money laundering transaction on October 23, 2013 in Everett, Massachusetts with CHEN. UCE  
21 4599 handed LAI a Federal Express box which contained \$128,800. UCE 4599 and LAI discussed  
22 setting up another money laundering deal in Boston for the following week. UCE 4599 requested the  
23 amount be no greater than \$200,000 at a time.  
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25 On October 30, 2013, UCE 4599 arranged a meeting with CHOW at a restaurant in San  
26 Francisco. The purpose of the meeting was to discuss illegal business opportunities with  
27 CHOW. CHOW advised he had a conversation with CHOW's associate about conducting illegal  
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1 business with UCE 4599. According to CHOW, CHOW's associate was apprehensive about conducting  
2 any type of illegal activity with UCE 4599 because UCE 4599 was not Chinese. CHOW was still upset  
3 with Andy LI over their recent physical altercation and advised that he had cut all ties with LI and  
4 CHANTHAVONG. CHOW discouraged UCE 4599 from doing any business with Andy LI. CHOW's  
5 associate entered the restaurant and sat down for lunch with CHOW and UCE 4599. UCE 4599 handed  
6 CHOW and two white envelopes which contained a total of \$2,500. UCE 4599 told CHOW the  
7 envelope marked with a "G" was for George NIEH. UCE 4599 told CHOW things were going well  
8 with Elaine LIANG and Serge GEE. CHOW thanked UCE 4599.  
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10 On November 1, 2013 two UCEs arranged to meet with NHINGSAVATH and another  
11 individual in a parking lot in a mall located in Paramus, New Jersey to conduct a money laundering  
12 transaction. At the meeting location, a black Jeep pulled next to the UCE vehicle. NHINGSAVATH  
13 exited from the passenger side. NHINGSAVATH retrieved a box from the rear driver's side  
14 compartment and gave the box to one of the UCEs. Both parties departed from the parking lot. The  
15 cash amount was later confirmed to be \$104,220.  
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17 On November 4, 2013, UCE 4599 arranged for NHINGSAVATH to meet with UCE 3322 at  
18 Beale and Howard Streets in San Francisco. UCE 3322 provided NHINGSAVATH with \$101,150.  
19 NHINGSAVATH wanted to know if they could continue to launder money while UCE 4599 was on  
20 vacation. UCE 3322 told him he was not sure and they both left.  
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22 On December 3, 2013, UCE 4599 arranged to meet KEITH JACKSON at a hotel in San  
23 Francisco. The purpose of the meeting was to discuss illegal business opportunities with JACKSON.  
24 UCE 4599 provided KEITH JACKSON with an update on the previously discussed sale of cocaine to  
25 BRANDON JACKSON and SULLIVAN. According to KEITH JACKSON, SULLIVAN and  
26 BRANDON JACKSON had enough money for 10 kilograms of cocaine. UCE 4599 told KEITH  
27 JACKSON the approximate price for the cocaine would be \$26,500 per kilogram. According to KEITH  
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JACKSON, BRANDON JACKSON owed CHANTHAVONG approximately \$9,000 for an unpaid drug debt. KEITH JACKSON was trying to negotiate with CHANTHAVONG on behalf of BRANDON JACKSON. KEITH JACKSON told UCE 4599 that he spoke with SENATOR YEE about the opportunity to traffic firearms. KEITH JACKSON told the UCE the weapons source of supply (SOS) was the "Real Deal." KEITH JACKSON said that SENATOR YEE gave KEITH JACKSON the permission to pursue the opportunity with UCE 4599. Specifically, KEITH JACKSON and SENATOR YEE were going to meet with the SOS to hash out a plan. SENATOR YEE requested that KEITH JACKSON broker all of the conversations regarding weapons trafficking with the SOS. UCE 4599 told KEITH JACKSON he would be compensated for his assistance. KEITH JACKSON believed SENATOR YEE needed to develop a level of comfort with UCE 4599. According to KEITH JACKSON, SENATOR YEE thought there would be an opportunity to launder the proceeds from the sales of future weapons.

During the same meeting, KEITH JACKSON told UCE 4599 he recently met with Barry HOUSE. KEITH JACKSON pointed to his bicep muscle and told UCE 4599 if s/he ever needed anything from HOUSE let him know. UCE 4599 told KEITH JACKSON he wanted one of his associates killed and asked if HOUSE could assist. KEITH JACKSON asked the race of the intended target and his location. KEITH JACKSON told UCE 4599 he would talk to HOUSE in person. KEITH JACKSON said if he didn't get HOUSE to commit the murder he would ask ROEUN. UCE 4599 told KEITH JACKSON he would prefer to work with HOUSE. UCE 4599 told KEITH JACKSON he would pay HOUSE \$25,000 for the murder. KEITH JACKSON told UCE 4599 he would talk to HOUSE the following day. KEITH JACKSON reiterated that ROEUN and his associates had the capabilities to kill people at a cheaper price than what the UCE was willing to pay.

On December 5, 2013, two UCES met with CHEN in a parking lot in Saugus, Massachusetts. CHEN was driven by another individual. CHEN exited his vehicle and got into the UCE vehicle.

1 CHEN placed a white plastic bag on the floor and removed several stacks of cash. CHEN said the bag  
2 contained a "flat 200," meaning \$200,000. On further inspection, it contained \$199,240. The UCE  
3 asked CHEN where he earned the money. CHEN stated he earned it "on the street" by "pushin' and  
4 everything." CHEN said it was from selling "weed." CHEN said that the area was a "pretty good  
5 market." The UCE asked CHEN if CHEN would consider partnering to sell drugs. CHEN said he  
6 understood and that they could discuss it in the future. CHEN then left.  
7

8 On December 6, 2013, UCE 4599 arranged to meet NIEH and LAI at a café in Millbrae,  
9 California. The purpose of the meeting was to provide \$191,270 in laundered drug proceeds to LAI to  
10 conclude the money laundering transaction on December 5, 2013. NIEH picked up UCE 4599 at 388  
11 Beale Street, San Francisco and drove to Peter's Café, Millbrae, California. According to NIEH, PAU  
12 owned an apartment in the vicinity of Hyde Street and Broadway in San Francisco which was currently  
13 being utilized by CHOW. NIEH and UCE 4599 met with LAI inside Peter's Café. UCE 4599 gave LAI  
14 a Federal Express box containing \$191,270. LAI asked UCE 4599 when his associates in Boston could  
15 be ready for another money laundering transaction. According to LAI, GEE was currently vacationing  
16 in the Maldives. LAI worked directly for GEE and was being paid for his services while GEE was  
17 away. After lunch, NIEH drove UCE 4599 back to San Francisco. During the ride back, UCE 4599  
18 asked if Ming MA could provide any firearms. NIEH told UCE 4599 guns were hard to get at the  
19 moment. NIEH pulled out a Beretta 9MM handgun from the center console. NIEH paid \$1,200 for the  
20 gun. NIEH advised he also kept a 9MM handgun in the trunk portion of his vehicle. UCE 4599  
21 provided NIEH with \$800.00 for his assistance during the money laundering transaction with LAI. I  
22 **believe this demonstrates probable cause for a violation of Title 18, United States Code, Sections**  
23 **1956(a)(1)(A) and (B) and 2 by CHEN, LAI, GEE, Elaine LIANG, and NIEH.**  
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25 On December 10, 2013, UCE 4599 met with Keith JACKSON, Brandon JACKSON, and  
26 SULLIVAN at a restaurant. They discussed that they were ready with money to purchase up to 10 kilos  
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1 of cocaine from UCE 4599's source of supply. UCE 4599 said they could do the deal in mid-January  
2 and the cocaine would cost \$26,500 per kilo. SULLIVAN later showed UCE 4599 several fraudulent  
3 credit cards out of his wallet.

4 On December 13, 2013, UCE 4599 met with KEITH JACKSON and BRANDON JACKSON at  
5 Roy's Restaurant, San Francisco, California. KEITH JACKSON said he had spoken to SENATOR  
6 YEE about setting up a meeting with a weapons trafficker. According to KEITH JACKSON,  
7 SENATOR YEE was going to call the trafficker the same day. KEITH JACKSON also advised that  
8 SENATOR YEE had an unidentified Filipino associate who was supplying "heavy" weapons to rebel  
9 groups in the Philippines. UCE 4599 handed KEITH JACKSON a white envelope containing \$1,000.  
10 UCE 4599 told KEITH JACKSON the \$1,000 was motivation for setting up the meeting with the  
11 weapons trafficker. According to KEITH JACKSON, the weapons trafficker had access to cargo  
12 containers full of weapons. UCE 4599 asked BRANDON JACKSON if the fraudulent credit cards that  
13 were being produced by SULLIVAN were reliable. BRANDON JACKSON confirmed they were  
14 reliable. KEITH JACKSON advised they could be used for gas and food. BRANDON JACKSON and  
15 KEITH JACKSON talked to UCE 4599 about a previously discussed cocaine transaction with UCE  
16 4599's purported source of supply for cocaine. KEITH JACKSON asked if UCE 4599 could assist in  
17 laundering the profits from the purported cocaine deal. BRANDON JACKSON advised that he and  
18 SULLIVAN would reinvest their initial profit from the first cocaine deal to buy more narcotics. KEITH  
19 JACKSON and UCE 4599 talked about a previously discussed murder for hire contract involving  
20 SULLIVAN and his associates. With reference to the contract for murder, KEITH JACKSON told UCE  
21 4599 "I want to keep that with us." KEITH JACKSON told UCE 4599 that an individual (later  
22 identified as Dr. Wilson LIM), was working to ship weapons to the Philippines. BRANDON  
23 JACKSON received a text on his cellular telephone from SULLIVAN requesting a name or an address  
24 for the intended target of UCE 4599's plan for murder. According to BRANDON JACKSON,  
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1 SULLIVAN had a contact within the California Department of Motor Vehicles who could procure a  
2 photograph of the intended target. BRANDON JACKSON told UCE 4599 they wanted to gather as  
3 much intelligence on the intended target to include his daily routine.

4 On December 17, 2013, UCE 4599 arranged a meeting with KEITH JACKSON and SULLIVAN  
5 at a restaurant located in San Francisco, California. UCE 4599 provided KEITH JACKSON with a  
6 \$5,000 check from another fictitious company belonging to UCE 4599, made out to Leland Yee,  
7 Secretary of State. KEITH JACKSON advised that he and SENATOR YEE would be meeting with an  
8 international weapons trafficker within the next few days. According to KEITH JACKSON, SENATOR  
9 YEE understood UCE 4599 wanted to meet with the arms dealer. KEITH JACKSON told UCE 4599 he  
10 would make sure the meeting would happen.

11 According to KEITH JACKSON, SENATOR YEE fully understood the check being provided to  
12 SENATOR YEE's campaign was solely for the purpose of getting an introduction to the arms dealer.  
13 KEITH JACKSON said "we just talked about that today."

14 UCE 4599 told KEITH JACKSON he wanted to receive a call from SENATOR YEE to  
15 acknowledge receiving the check. KEITH JACKSON received a call from SENATOR YEE in the  
16 presence of UCE 4599 and handed the phone to UCE 4599. UCE 4599 told SENATOR YEE he had  
17 raised \$5,000 for his campaign and looked forward to meeting their "mutual friends." UCE 4599 told  
18 SENATOR YEE he was looking forward to immediate opportunities with SENATOR YEE. After the  
19 call with SENATOR YEE, KEITH JACKSON inquired about a purported cocaine deal with  
20 SULLIVAN and BRANDON JACKSON. KEITH JACKSON advised that SULLIVAN and  
21 BRANDON JACKSON would pay KEITH JACKSON a percentage from the profits of the cocaine deal.  
22 SULLIVAN provided the following counterfeit credit cards to UCE 4599: one Bank of America Visa;  
23 two Bank of America MasterCard; one Patelco MasterCard. All credit cards were under the name  
24 Joseph Viso, a fictitious name provided by UCE 4599.



1 On January 9, 2014, UCE 4599 met with CHOW and NIEH. NIEH and CHOW picked up UCE  
2 4599 at 388 Beale Street, San Francisco and drove to Yank Sing restaurant, San Francisco. UCE 4599  
3 provided CHOW with a white envelope containing \$1,500. UCE 4599 told CHOW the money was  
4 payment for previous money laundering deals with Elaine LIANG and Serge GEE. UCE 4599  
5 complained about the lack of communication between UCE 4599 and LAI. UCE 4599 told CHOW and  
6 NIEH they would be missing out on approximately \$4,000 per month if the relationship with GEE and  
7 LIANG was discontinued. CHOW was trying to recall if he ever met LAI. UCE 4599 gave NIEH \$500  
8 and requested NIEH to get his phone issues fixed.

10 On January 22, 2014, UCE 4599 arranged to meet KEITH JACKSON and SENATOR YEE at a  
11 coffee shop located in San Francisco to discuss details of an international weapons trafficking  
12 transaction with SENATOR YEE and KEITH JACKSON. While waiting for SENATOR YEE to arrive,  
13 KEITH JACKSON told UCE 4599 he, KEITH JACKSON, was confident the weapons deal would  
14 happen but it would require KEITH JACKSON's involvement every step along the way. According to  
15 KEITH JACKSON, the source of supply for the weapons was extremely cautious about meeting UCE  
16 4599. KEITH JACKSON encouraged UCE 4599 to talk to SENATOR YEE about the timeline and  
17 specifics of the weapons deal because the arms dealer was SENATOR YEE's contact. UCE 4599 told  
18 KEITH JACKSON he gave \$5,000 to SENATOR YEE for the sole purpose of meeting the arms dealer.  
19 KEITH JACKSON understood that the arms dealer was SENATOR YEE's contact and encouraged  
20 UCE 4599 to broach that conversation with SENATOR YEE.

23 KEITH JACKSON continued the conversation by telling UCE 4599, SULLIVAN was in the  
24 process of manufacturing fake credit cards for UCE 4599. UCE 4599 told KEITH JACKSON that he  
25 would get in touch with SULLIVAN over the next few days.

26 UCE 4599 and KEITH JACKSON were greeted by SENATOR YEE. UCE 4599 understood  
27 SENATOR YEE had some recent discussions with the arms dealer. SENATOR YEE explained he has  
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1 known the arms dealer for a number of years and has developed a close relationship with him.

2 SENATOR YEE told UCE 4599 that the arms dealer "Has things that you guys want." SENATOR YEE  
3 cautioned that doing business with people like the arms dealer was not easy and told UCE 4599 this was  
4 not a business for "the faint of heart." SENATOR YEE explained the arms dealer was very cautious  
5 about who he conducted business with. SENATOR YEE would tell the arms dealer to work with  
6 KEITH JACKSON because SENATOR YEE trusted KEITH JACKSON.  
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8 UCE 4599 explained he understood the complexity of trafficking weapons and the importance of  
9 remaining safe. While UCE 4599 had confidence in KEITH JACKSON, he wasn't sure KEITH  
10 JACKSON would be able to address any of the arms dealer's issues without direct input from UCE 4599.  
11 The arms dealer was willing to "surface himself" at SENATOR YEE's request. According to  
12 SENATOR YEE, the arms dealer advised YEE on how the weapons deal would unfold. According to  
13 SENATOR YEE the arms dealer is "low-key" and has been trafficking weapons for quite a while.  
14 According to SENATOR YEE, the arms dealer sourced the weapons from Russia. SENATOR YEE  
15 thought the ability to traffic weapons with the arms dealer would be based on trust and would take time.  
16 SENATOR YEE said "We're interested" in arranging the weapons deal and thought the arms dealer  
17 would go back to talk to "his folks." SENATOR YEE said of the arms dealer, "He's going to rely on  
18 me, because ultimately it's going to be me."  
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20 UCE 4599 stated he would compensate SENATOR YEE for brokering the relationship and arms  
21 deal with the arms dealer. UCE 4599 stated he had made a monetary commitment to SENATOR YEE  
22 and wanted assurance the weapons deal was a real opportunity. SENATOR YEE told UCE 4599 he was  
23 right to be suspicious and cautious but assured UCE 4599 he wasn't going to let him go on a "wild  
24 goose chase." SENATOR YEE assured UCE 4599 the opportunity to purchase weapons from the arms  
25 dealer was real. SENATOR YEE said "I know what he could do. I have seen what he has done in the  
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1 past on other products and this guy has the relationships.” SENATOR YEE emphasized that the arms  
2 dealer took baby steps and was very careful.

3       According to SENATOR YEE, the arms dealer had contacts in Russia, Ukraine, Boston and  
4 Southern California. UCE 4599 asked SENATOR YEE for his commitment. SENATOR YEE said “Do  
5 I think we can make some money? I think we can make some money. Do I think we can get the goods? I  
6 think we can get the goods.” SENATOR YEE thought it was more about the timing and who was going  
7 to get directly involved. SENATOR YEE said he believed KEITH JACKSON had to be committed to  
8 making the deal happen. KEITH JACKSON told SENATOR YEE “I’m in man.”

10       SENATOR YEE said that he wanted KEITH JACKSON and UCE 4599 to understand what they  
11 were about to get into. SENATOR YEE cautioned UCE 4599 and KEITH JACKSON and recounted a  
12 story of the last time he was in the Philippines. According to SENATOR YEE, he was surrounded by  
13 “armed guards with machine guns.” SENATOR YEE said “Because, I’m getting a little more into this,  
14 it’s not just Russia; the Muslim countries have sources too. And so, that has been brought to my  
15 attention recently.”

17       KEITH JACKSON asked UCE 4599 “You know what you want right?” UCE 4599 told  
18 SENATOR YEE and KEITH JACKSON he wanted any type of “shoulder fired” weapons or missiles.  
19 SENATOR YEE asked UCE 4599 if he wanted “automatic weapons” as opposed to semi-automatic  
20 weapons. UCE 4599 confirmed with SENATOR YEE he wanted automatic weapons. KEITH  
21 JACKSON asked UCE 4599 about the quantity. UCE 4599 told SENATOR YEE and KEITH  
22 JACKSON anywhere between \$500,000 - \$2,500,000 worth of weapons.

24       With regards to the specific weapons and quantity, SENATOR YEE directed UCE 4599 to let  
25 KEITH JACKSON know. KEITH JACKSON would communicate with SENATOR YEE who in turn  
26 would communicate with the arms dealer directly. SENATOR YEE further added “I don’t think we  
27 need to worry about that. I think we ought to focus our attention on developing this relationship.”  
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1 UCE 4599 told SENATOR YEE he appreciated the opportunity with the arms dealer and that he  
2 had contributed directly and indirectly to SENATOR YEE's campaign [referencing campaign  
3 contributions to SENATOR YEE made in exchange for official action by other associates of UCE  
4 4599]. SENATOR YEE told UCE 4599 he saw their relationship as tremendously beneficial. When  
5 SENATOR YEE became Secretary of State he wanted UCE 4599 and KEITH JACKSON to make all  
6 the money because he didn't "want to go to jail." UCE 4599 promised SENATOR YEE he would take  
7 care of those who took care of him and would pay SENATOR YEE and KEITH JACKSON "hundreds  
8 of thousands of dollars." SENATOR YEE instructed UCE 4599 to tell his family that when he won the  
9 election for California Secretary of State he would appoint UCE 4599 to a Russian delegation. UCE  
10 4599 told SENATOR YEE he was looking for something more immediate. UCE 4599 asked  
11 SENATOR YEE for a direct introduction to the arms dealer. SENATOR YEE refused but said "Look,  
12 he knows what I want. I have opened the discussion. What I got to help him understand is that KEITH  
13 [JACKSON] is a conduit to other people." UCE 4599 told SENATOR YEE depending on the size of  
14 the first deal he would pay SENATOR YEE and KEITH JACKSON \$100,000. SENATOR YEE said  
15 "Alright, take care." The meeting ended.

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18 On January 24, 2014, UCE 4599 arranged to meet KEITH JACKSON at a restaurant in San  
19 Francisco. The purpose of the meeting was to discuss illegal activities with KEITH JACKSON. UCE  
20 4599 provided KEITH JACKSON with a white envelope containing \$1,000. UCE 4599 told KEITH  
21 JACKSON he wanted a meeting with the arms dealer by February 12, 2014. KEITH JACKSON told  
22 UCE 4599 he would put off other requests made by SENATOR YEE until SENATOR YEE acquiesced  
23 and set up the meeting with the arms dealer. According to KEITH JACKSON, SENATOR YEE was  
24 afraid of being cut out of the opportunity to make money on the weapons trafficking deal if UCE 4599  
25 struck a relationship with the arms dealer directly. UCE 4599 assured KEITH JACKSON he would pay  
26 SENATOR YEE at least \$100,000 upon completion of the first weapons transaction.  
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1 KEITH JACKSON also advised there was an opportunity to procure weapons through a  
2 "Filipino connection." According to KEITH JACKSON, one of the "Filipinos" had a nephew in the  
3 Philippines who was supplying weapons to Muslim Rebel Groups in the Philippines. KEITH  
4 JACKSON thought SENATOR YEE was nervous about introducing UCE 4599 to the first arms dealer  
5 because of UCE 4599's connection to Raymond CHOW. KEITH JACKSON said SENATOR YEE  
6 liked CHOW but didn't trust him. UCE 4599 told KEITH JACKSON he paid SENATOR YEE \$5,000  
7 to set up the meeting with the arms dealer and he expected SENATOR YEE to deliver on his promise.  
8 KEITH JACKSON said that SENATOR YEE brought the opportunity to traffic weapons to KEITH  
9 JACKSON during a trip to Los Angeles. KEITH JACKSON said he picked up SENATOR YEE and the  
10 arms dealer at the airport, and SENATOR YEE directed KEITH JACKSON to work with the arms  
11 dealer on trafficking weapons.  
12

13 UCE 4599 told KEITH JACKSON he was supposed to meet with SULLIVAN regarding the  
14 purchase of fraudulent credit cards. KEITH JACKSON also advised that Rinn ROEUN had access to  
15 approximately 50 weapons. According to KEITH JACKSON, when SENATOR YEE told UCE 4599 he  
16 went to the Philippines and was surrounded with 15 armed guards, it was the same Muslim Rebel Group  
17 being supplied by the nephew of the aforementioned Filipino. KEITH JACKSON stated he was going  
18 to meet with the owner of a marijuana dispensary in San Francisco to pick up a campaign donation on  
19 behalf of SENATOR YEE. KEITH JACKSON surmised this would be a good year for medical  
20 marijuana legislation. KEITH JACKSON told UCE 4599 that CHOW and his girlfriend recently broken  
21 up. CHOW was living at an apartment on Hyde Street in San Francisco.  
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23 On January 28, 2014, UCE 4599 met with NIEH and YUN. NIEH picked UCE 4599 up in his  
24 car and they drove to Millennium Therapeutics to meet with YUN. UCE 4599 and YUN discussed the  
25 sale of approximately 200 master cases (12,000 cartons) of purportedly stolen cigarettes in New York  
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1 City in the future. The price per carton to YUN would be \$28 per carton and YUN would sell them for  
2 \$32 per carton. YUN also offered to sell pounds of Snowberry Kush (a type of marijuana).

3 On January 28, 2014, UCE 4599 met with Keith JACKSON and Brandon JACKSON at a  
4 restaurant in San Francisco, California. Brandon JACKSON provided UCE 4599 with an envelope  
5 containing 25 fraudulent credit cards. UCE 4599 gave Brandon JACKSON a white envelope containing  
6 \$1,250 as payment for the credit cards.  
7

8 On February 3, 2014, UCE 4599 arranged to meet with BRANDON JACKSON and SULLIVAN  
9 at a hotel in San Francisco. At the meeting, SULLIVAN stated that he had spent \$15,000 preparing for  
10 a 10 kilogram transaction with UCE 4599's associates. SULLIVAN also stated that he got an apartment  
11 to use as a stash house in Hartford, Connecticut, and a vehicle with a concealment compartment.  
12 SULLIVAN stated that while he was conducting the cocaine transaction with UCE 4599 and his  
13 associates, BRANDON JACKSON would wait at the apartment in Hartford. SULLIVAN also stated  
14 that he sent a cocaine press and other equipment from San Francisco to Hartford. UCE 4599 told  
15 SULLIVAN to be careful transporting the cocaine from New Jersey to Hartford. SULLIVAN said if he  
16 were pulled over by law enforcement, he would be able to talk his way out of it because he was not  
17 "hood." UCE 4599 told SULLIVAN that the fraudulent credit cards SULLIVAN provided worked very  
18 well. SULLIVAN produced a fraudulent American Express Bluebird card in another person's name.  
19 They discussed the murder for hire proposed earlier. UCE 4599 told SULLIVAN he would bring the  
20 intended target to a restaurant in San Francisco so that SULLIVAN could get a good physical  
21 description of the intended target. UCE 4599 told SULLIVAN that the intended target was living in  
22 Reno, Nevada, and travelling to the Bay Area to visit someone. UCE 4599 asked SULLIVAN not to kill  
23 the target in the presence of UCE 4599. SULLIVAN and BRANDON JACKSON assured UCE 4599  
24 that would not happen.  
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1 SULLIVAN asked if UCE 4599 would be able to launder proceeds from SULLIVAN's cocaine  
2 deal. UCE 4599 said that he could. SULLIVAN stated that he was prepared to do 10 years in prison at  
3 any time, that he had a clean criminal record, and that "Ten is the max I'll get." SULLIVAN told UCE  
4 4599 that living a criminal lifestyle was more of a "power and challenge thing," that SULLIVAN didn't  
5 have to manufacture fraudulent credit cards, but "it was fun."

6  
7 SULLIVAN and UCE 4599 discussed diluting or "stepping on" the cocaine to maximize profit.  
8 SULLIVAN stated he used Inositol as a cutting agent for the cocaine. SULLIVAN paid for the bill from  
9 the restaurant with a fraudulent credit card and SULLIVAN showed UCE 4599 a fraudulent California  
10 driver's license. UCE 4599 asked if SULLIVAN had the stuff to make fraudulent credit cards at his  
11 residence and SULLIVAN replied "I got another spot." SULLIVAN advised UCE 4599 to "always get  
12 another spot for different operations." SULLIVAN said he purchased the electronic keys for the  
13 fraudulent credit cards from an unknown individual in Russia who was identified as "The President."  
14 SULLIVAN stated he used web sites to include ICQ to contact sellers of electronic keys and that  
15 SULLIVAN paid for the electronic keys with the virtual currency, Bitcoin.  
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17 On the murder for hire, SULLIVAN stated "it's easy work" and added "I will put eyes on the  
18 guy and have my boy knock him down." UCE 4599 stated he thought that SULLIVAN would bring  
19 someone from the East Coast to murder the intended target. SULLIVAN replied "I got a hundred  
20 niggas, I still got my ties to the street. I got young boys who love me."

21  
22 On February 5, 2014, UCE 4599 met with LI at a restaurant in San Francisco. LI said  
23 NHINGSAVATH was a victim of a home invasion robbery and that he and his girlfriend were zip tied  
24 and assaulted. NHINGSAVATH supposedly lost 50 pounds of processed marijuana, jewelry, clothes,  
25 electronics, and cash. LI thought NHINGSAVATH was targeted after bringing a stripper home a week  
26 before the home invasion. LI said the home invasion crew was Mexican and did not wear masks. LI  
27 thought they were inexperienced since they didn't wear masks and they didn't kill NHINGSAVATH or  
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1 his girlfriend. LI said he reached out to a ranking member of a Mexican gang to get information on who  
2 did the home invasion. LI discussed his rift with CHOW. According to LI, CHOW introduced  
3 CHANTHAVONG to people in New York and CHANTHAVONG had been conducting business with  
4 them. After the altercation between LI and CHOW, CHOW told the New York associates not to do any  
5 more business with CHANTHAVONG. LI asked if UCE 4599 wanted to purchase pounds of  
6 marijuana. UCE 4599 said he would get back to LI.

8 On February 5, 2014, UCE 4599 sent text messages from UCE 4599's cell phone to  
9 SULLIVAN's cell phone in preparation for SULLIVAN identifying the murder for hire victim. The  
10 following are the text messages, beginning at 10:30 a.m.:

12 UCE 4599: tomorrow 6PM at [restaurant] in SF

13 UCE 4599: big open floor plan

14 UCE 4599: You can probably get a good look from the bar

15 UCE 4599: can you make it?

16 At approximately 10:40 a.m., SULLIVAN responded via text with: "Okay."  
17

18 On February 6, 2014, UCE 4599 and UCE 4684 (posing as the intended murder victim) staged a  
19 meeting at a restaurant in San Francisco. At approximately 5:21 p.m., UCE 4599 sent a text to  
20 SULLIVAN letting him know that the UCEs were at the restaurant. At approximately 5:44 p.m., agents  
21 observed SULLIVAN enter the restaurant wearing a black grey spotted sweater, green pants, and a red  
22 knit ball cap with a black stripe. SULLIVAN scanned the area and took a seat at the bar facing the  
23 dining area where UCE 4599 and UCE 4684 sat, with a clear view of UCE 4684. At approximately 6:13  
24 p.m., SULLIVAN left the restaurant. Later, they exchanged these texts from cell phone to cell phone:  
25  
26

27 February 6, 2014

28 At 6:23 p.m., UCE 4599: Get what you needed?



1 February 7, 2014

2 At 12:04 a.m., SULLIVAN: All good.

3 At 8:49 a.m., UCE 4599: Cool, when you walked into the restaurant I thought you were going to  
4 jack the place

5 March 3, 2014

6 At 12:06 p.m., UCE 4599: I still owe you \$10,000 for that matter [referring to murder for hire] I  
7 didn't forget

8 At 12:16 p.m., SULLIVAN: Been waiting on you. I never will tell you what can be done if it  
9 really can't.

10 **I believe that this demonstrates probable cause for a violation of Title 18, United States Code,**  
11 **Section 1958 by SULLIVAN, Keith JACKSON, and Brandon JACKSON.**

12 On February 11, 2014, two UCEs met MASTRANGELO and another individual in a parking lot  
13 in Paramus, New Jersey to pick up money for laundering. They arrived in a blue BMW.  
14 MASTRANGELO exited the car and delivered a white box. MASTRANGELO said it contained  
15 \$100,000. It was later confirmed to contain \$99,930. On February 12, 2014, UCE 4599 met with  
16 NHINGSAVATH at Howard and Beale Streets in San Francisco. UCE 4599 handed NHINGSAVATH  
17 a FedEx box containing \$97,000. NHINGSAVATH discussed the home invasion robbery where he was  
18 a victim.  
19  
20

21 On February 12, 2014, UCE 4599 met with KEITH JACKSON and BRANDON JACKSON at  
22 Howard and Beale Streets in San Francisco. UCE 4599 told BRANDON JACKSON that the arranged  
23 cocaine deal for the following week would be delayed until KEITH JACKSON could arrange a meeting  
24 between UCE 4599 and the arms dealer. KEITH JACKSON and UCE 4599 then headed to a sporting  
25 event together.  
26  
27  
28

1 At the event, they continued to discuss meeting with the arms dealer. KEITH JACKSON said  
2 that SENATOR YEE also had a Filipino connection for weapons that SENATOR YEE was already  
3 “down with.” KEITH JACKSON said that SENATOR YEE had dealt with the Filipino’s “plenty of  
4 times.” KEITH JACKSON said that SENATOR YEE asked to raise \$50,000 for his Secretary of State  
5 campaign. UCE 4599 told KEITH JACKSON that he would be willing to give SENATOR YEE more  
6 money once the first shipment of weapons was complete.  
7

8 On February 18, 2014, UCE 4599 arranged a meeting with NIEH and YUN to purchase pounds  
9 of marijuana. NIEH picked up UCE 4599 and they traveled to Millennium Therapeutic. UCE 4599 and  
10 NIEH met YUN and went to a restaurant. They discussed a previously arranged cigarette deal, and  
11 agreed that it would happen one month later than they had planned. YUN told UCE 4599 that she had  
12 four one pound samples of different strains of indoor marijuana for purchase. NIEH had three pounds in  
13 his car and YUN had one pound at Millennium. YUN stated her source of supply would be able to  
14 provide 50 pounds of marijuana at a time. They walked to Millennium and went into a storage area.  
15 YUN provided UCE 4599 with one pound of “Sour Diesel” marijuana. YUN confirmed that she  
16 previously gave NIEH three pounds and that it was in NIEH’s vehicle. UCE 4599 paid YUN \$8,200 for  
17 the marijuana. NIEH drove back to San Francisco where NIEH parked his car and opened his trunk.  
18 NIEH gave the remaining three pounds of marijuana to UCE 4599. Presumptive tests were positive for  
19 marijuana.  
20  
21  
22

23 On February 18, 2014, UCE 4599 arranged a meeting with ROEUN at ROEUN’s place of  
24 employment. ROEUN stated that his marijuana grow was robbed and that ROEUN was able to identify  
25 where the robbers lived but that it was not worth retribution. ROEUN told UCE 4599 that he would be  
26 providing UCE 4599 with two ARs, one fully automatic AK, and two handguns. UCE 4599 paid  
27 ROEUN \$9,000 in cash as pre-payment for the firearms.  
28

1 On February 20, 2014, Oakland Police Department (OPD) Officers, FBI and IRS Special Agents,  
2 executed a State Search Warrant issued by the Superior Court of California, County of Contra Costa, at  
3 a residence located at 5555 Merritt Drive, Concord, California (hereinafter Merritt).

4 Earlier, in January, 2014, an investigation began pertaining to Merritt, a residence suspected of  
5 being a site for an indoor marijuana cultivation operation. Public records showed the residence was  
6 owned by TILTON, and purchased on April 27, 2012 after foreclosure proceedings. A Special Agent of  
7 the Internal Revenue Service, reviewed mortgage documents and bank records for TILTON and found  
8 that TILTON purchased the property in cash for \$342,764.87. Multiple individuals were found to  
9 deposit cash into the escrow pertaining to the purchase of Merritt, to include Tina LIANG in the amount  
10 of \$100,000, Jane LIANG in the amount of \$29,764.87, TILTON in the amount of \$73,000, and three  
11 other associated individuals in the amounts of \$70,000, \$30,000 and \$10,000.  
12

13 On January 2, 2014, TILTON and another male were observed arriving at the Merritt address in  
14 a grey Toyota pickup. Both TILTON and the other individual entered Merritt and were seen moving a  
15 large tray from the pickup truck to the garage of the residence. TILTON and the other individual also  
16 loaded multiple large black bags from the residence into the truck.  
17

18 At the Merritt search warrant location on February 20, 2014, Officers and Agents discovered an  
19 indoor marijuana grow inside the residence. No persons were present at the time the search warrant was  
20 executed. The residence had no obvious sleeping quarters as it was apparent the home was converted  
21 completely into an indoor marijuana grow site. Among items seized at the location, included 503  
22 marijuana plants (354 with root balls and 149 without), indicia for Brian Seiki TILTON (to include a tax  
23 refund check). A representative from the Pacific Gas and Electricity (PG&E), the company that services  
24 provides power to Merritt, arrived at the residence and indicated the electricity used to power the  
25 marijuana grow equipment was supplied by stolen electricity. From my training and experience, I know  
26 it is typical for individuals involved in operating illegal marijuana grows in residences to bypass  
27  
28

1 electricity to avoid the scrutiny of law enforcement. **I believe that this demonstrates probable cause**  
2 **for a violation of Title 21, United States Code, Section 846 by Tina LIANG and Bryan TILTON.**

3 On February 25, 2014, UCE 4599 met with KEITH JACKSON at a restaurant located in San  
4 Francisco, California and planned to meet SENATOR YEE soon after at the same restaurant. During  
5 the discussion prior to the arrival of SENATOR YEE, KEITH JACKSON told UCE 4599 that  
6 SENATOR YEE was the driving force behind making the introduction between UCE 4599 and the arms  
7 dealer. By delaying the meet with the arms dealer, KEITH JACKSON felt SENATOR YEE was  
8 hindering the progress of a purported cocaine deal between UCE 4599, SULLIVAN and BRANDON  
9 JACKSON. KEITH JACKSON continued by saying the arms dealer was the "real deal" and was  
10 SENATOR YEE's "guy." According to JACKSON, SENATOR YEE was in control of introducing  
11 UCE 4599 to the arms dealer.  
12

13 KEITH JACKSON stressed the importance of completing a purported cocaine transaction with  
14 SULLIVAN and BRANDON JACKSON. KEITH JACKSON told UCE 4599 he met with one of  
15 SULLIVAN's associates (not further identified) during SULLIVAN's father's funeral. The unknown  
16 associate asked KEITH JACKSON if the cocaine transaction would come to fruition. KEITH  
17 JACKSON told the unknown associate he would "make it happen." According to KEITH JACKSON,  
18 BRANDON JACKSON was currently living with his mother and was planning to move at the end of  
19 March (2014). UCE 4599 told KEITH JACKSON he owed SULLIVAN \$10,000 for a previously  
20 negotiated murder for hire plot against one of UCE 4599's associates. When it came to criminal matters,  
21 KEITH JACKSON stated he preferred UCE 4599 work with "people in our circle." When SENATOR  
22 YEE arrived to the restaurant, UCE 4599 asked SENATOR YEE for some clarification on how to  
23 progress with matters related to the arms dealer. SENATOR YEE advised he needed to be careful  
24 because of the recent indictment and conviction of another California State Senator. SENATOR YEE  
25 was referring to the arrest and indictment of a California State Senator who allegedly was involved in  
26  
27  
28

1 public corruption. SENATOR YEE believed the other State Senator was wearing a "wire" for the  
2 FBI. SENATOR YEE thought the other State Senator was a classic example of involving too many  
3 people in illegal activities. SENATOR YEE believed his arms dealer connection could in fact provide  
4 weapons to UCE 4599. SENATOR YEE took an "agnostic" stance on UCE 4599 and the dealer's  
5 purported weapons deal. SENATOR YEE said "People want to get whatever they want to get. Do I  
6 care? No, I don't care. People need certain things." SENATOR YEE recognized UCE 4599 needed  
7 assurance the weapons deal was in fact a real opportunity. According to SENATOR YEE, it was the  
8 "Real deal." SENATOR YEE encouraged UCE 4599 to start off doing small deals with the arms  
9 dealer. However, SENATOR YEE emphasized the arms dealer would not engage with UCE 4599  
10 unless SENATOR YEE was involved. SENATOR YEE told UCE 4599 he had other sources of supply  
11 for weapons.  
12

13  
14 SENATOR YEE advised the weapons deal would probably not happen until the end of the  
15 year. SENATOR YEE would do everything he could to ensure the connection was comfortable in  
16 dealing with UCE 4599. At some point last year, SENATOR YEE wanted to move forward with  
17 facilitating conversations with the arms dealer and UCE 4599 but the arms dealer wasn't ready.  
18 SENATOR YEE was "in-sync," meaning on board, with UCE 4599 when it came to the opportunity to  
19 traffic firearms. UCE 4599 understood SENATOR YEE was in control of setting up the meeting with  
20 the arms dealer. SENATOR YEE asked what it would take to make UCE 4599 feel comfortable. UCE  
21 4599 responded by saying he wanted to have a dialogue with the arms dealer about the logistical issues  
22 associated with trafficking firearms internationally. UCE 4599 continued by saying, he also wanted to  
23 know what type of firearms the dealer could supply. UCE 4599 specifically told SENATOR YEE he  
24 was looking to obtain weapons that were mobile, light and powerful. SENATOR YEE responded by  
25 saying he did not believe the arms dealer would openly discuss the types of weapons during the first  
26 meeting. SENATOR YEE continued by saying he thought the arms dealer would suspect UCE 4599 of  
27  
28

1 being an "agent," meaning law enforcement, if specific weapons were discussed at the initial meeting.  
2 UCE 4599 advised he anticipated spending \$2,000,000 for the first shipment of weapons. UCE 4599  
3 specifically told SENATOR YEE he was looking to obtain a container of weapons. According to  
4 SENATOR YEE, the arms dealer was "doing stuff" in a foreign country and warned that the arms dealer  
5 was a very serious person to do business with. SENATOR YEE would see what he could do to facilitate  
6 the meeting with the arms dealer.  
7

8 UCE 4599 asked SENATOR YEE what he [SENATOR YEE] needed to make the meeting  
9 happen. SENATOR YEE said he believed the more people involved in the weapons deal, the greater the  
10 chances that SENATOR YEE would be implicated. UCE 4599 responded by saying he had as much to  
11 lose as SENATOR YEE if UCE 4599 was caught. UCE 4599 told SENATOR YEE he had a great life  
12 and would not do anything to jeopardize his lifestyle. SENATOR YEE stated he was unhappy with his  
13 life and said "There is a part of me that wants to be like you. You know how I'm going to be like you?  
14 Just be a free-agent out there." SENATOR YEE told UCE 4599 he wanted to hide out in the  
15 Philippines. JACKSON reiterated the importance of having UCE 4599 meet with the arms  
16 dealer. SENATOR YEE attributed his long career in public office to being careful and  
17 cautious. SENATOR YEE advised if the arms dealer was ever caught by law enforcement, he may  
18 implicate UCE 4599. UCE 4599 requested a high level meeting to talk about the fundamentals of  
19 working together. UCE 4599 assured SENATOR YEE he would not talk about specific weapons like  
20 Hell-Fire Missiles during his initial meeting with the arms dealer. UCE 4599 assured SENATOR YEE  
21 he would continue to provide him with the support he needed to be successful. SENATOR YEE said he  
22 would figure out a way for UCE 4599 to meet with the arms dealer. At the conclusion of the meeting,  
23 all departed from the restaurant.  
24  
25  
26

27 On February 26, 2014, UCE 4599 returned to ROEUN's place of employment in San Francisco.  
28 ROEUN provided UCE 4599 with the following weapons: one silver Strum P90 .45 ACP; one black



1 Smith and Wesson, .44 Magnum revolver; one black AR-15 pattern rifle (with no serial number or  
2 manufacturing markings on the lower receiver, the upper receiver marked Palmetto), with a magazine  
3 marked "5.56 x 45 PMAG30"; one black and green AR-15 pattern rifle (with no serial number or  
4 manufacturing markings), with a magazine marked "5.56 x 45 PMAG30". ROEUN discussed his  
5 source of supply for firearms. **I believe that this demonstrates probable cause for a violation of Title**  
6 **18, United States Code, Section 922(a)(1) by ROEUN.**  
7

8 On February 28, 2014, SFPD conducted surveillance on an annual HST dinner at New Asia  
9 Restaurant in Chinatown. Among the attendees were CHOW, SENATOR YEE, [REDACTED]  
10 [REDACTED] Ming MA, George NIEH,  
11 Kevin SIU, Leslie YUN, and James PAU. According to SFPD Gang Task Force surveillance,  
12 SENATOR YEE gave a speech at the event.  
13  
14

15 On March 4, 2014, KEITH JACKSON contacted UCE 4599 by telephone. JACKSON reported  
16 that YEE wanted to shift to another source to get weapons for UCE 4599 – Dr. Wilson LIM. KEITH  
17 JACKSON offered to set up a meeting for UCE 4599 with SENATOR YEE on March 5, 2014, to  
18 discuss this new potential source of supply. UCE 4599 asked about logistics and told KEITH  
19 JACKSON that UCE 4599 intends to bring any weapons back through the Port of Newark, New Jersey.  
20

21 On March 5, 2014, UCE 4599 met with KEITH JACKSON and SENATOR YEE at a hotel  
22 restaurant located in San Francisco, California to discuss firearms trafficking. At the restaurant, prior to  
23 the arrival of SENATOR YEE, KEITH JACKSON advised that a person later identified as Dr. Wilson  
24 LIM, would be the point of contact in the United States for the weapons deal in the Philippines. One of  
25 LIM's relatives would be the contact in the Philippines. KEITH JACKSON and BRANDON JACKSON  
26 met with LIM the previous Sunday. According to KEITH JACKSON, LIM was excited to meet UCE  
27 4599. LIM's associates in the Philippines were trying to overthrow the current government and needed  
28

1 money. KEITH JACKSON advised that the prior source of weapons was currently tied up with matters  
2 related to world affairs. Later at the restaurant, SENATOR YEE arrived. UCE 4599 told SENATOR  
3 YEE his family in New Jersey wanted to give their full support to SENATOR YEE's bid for California  
4 Secretary of State. UCE 4599 told SENATOR YEE his family controlled a large portion of the Port of  
5 Newark, New Jersey and was currently establishing companies in support of a weapons trafficking  
6 deal. SENATOR YEE told UCE 4599 he appreciated UCE 4599's father's perspective and support and  
7 continued by saying "I can be of help to you for 10 months or I can be of help to you for eight years. I  
8 think eight years is a lot better than 10 months." SENATOR YEE hoped that he would win his bid for  
9 Secretary of State but if he didn't, SENATOR YEE wanted to move into the private sector and exploit  
10 all the relationships he had in Asia for various kinds of activities.  
11

12 SENATOR YEE was rapidly depleting his campaign funds and asked UCE 4599 to contribute  
13 money to his Secretary of State campaign. UCE 4599 reiterated his support and asked for their plan,  
14 SENATOR YEE and LIM, on the weapons trafficking deal. SENATOR YEE explained LIM was  
15 originally from the Mindanao region of the Philippines. According to SENATOR YEE, Mindanao was  
16 largely populated by Muslim rebel groups who were fighting the federal government. SENATOR YEE  
17 continued by saying the Muslim rebels had no problem "kidnapping individuals, killing individuals and  
18 extorting them for ransom." SENATOR YEE recalled a trip approximately two years ago where  
19 SENATOR YEE visited Mindanao at the invitation of the Mindanao government. SENATOR YEE said  
20 when he arrived, he was surrounded by numerous armed guards carrying automatic rifles.  
21

22 SENATOR YEE stated that LIM's SOS for the weapons was a Philippine citizen who previously  
23 sold guns to individuals (not further identified) from Florida. LIM's SOS delivered a shipment of  
24 weapons to the port of Cagayan de Oro. The weapons were picked up by the unidentified individuals  
25 from Florida and shipped to an unknown location. SENATOR YEE stated he thought that was "The  
26 ideal way of handling it." UCE 4599 explained he had holding companies established the Port of  
27  
28

1 Newark, New Jersey. UCE 4599 told SENATOR YEE he would pick up the weapons in the Philippines  
2 and ship them back to the Port of Newark. From there, a portion of the weapons would be shipped to  
3 Sicily and then on to North Africa. UCE 4599 asked SENATOR YEE if the SOS could ship the  
4 weapons directly to the United States. SENATOR YEE explained it would be easier if UCE 4599  
5 picked up the weapons in the Philippines.  
6

7 According to SENATOR YEE, the SOS for weapons was surprised to hear UCE 4599 wanted to  
8 spend \$2,000,000 for the initial purchase of weapons. SENATOR YEE thought \$2,000,000 was a lot of  
9 money and said "We can't catch attention to any of this stuff." UCE 4599 reiterated they would pick up  
10 the weapons and bring it back to New Jersey. UCE 4599 told SENATOR YEE he understood the  
11 importance of practicing discretion and not garnering any unwanted attention. SENATOR YEE told  
12 UCE 4599 he "Wanted to protect the entire enterprise" to include the SOS and UCE 4599. SENATOR  
13 YEE talked about the lifecycle of the weapons deal from the initial pick-up in Cagayan de Oro to the  
14 transfer the weapons back to "U.S. territories." UCE 4599 told SENATOR YEE he was least worried  
15 about getting the weapons back to the United States.  
16

17 SENATOR YEE advised the Philippines was a very corrupt country and UCE 4599 needed to be  
18 prepared to pay people at every level during the lifecycle of the deal. UCE 4599 told SENATOR YEE  
19 his family controlled a big portion of the Port of Newark and was accustomed to paying people  
20 off. SENATOR YEE told UCE 4599 he visited New Jersey and felt like he was back in the 1950s.  
21

22 UCE 4599 asked SENATOR YEE what type of weapons the SOS in the Philippines had access to.  
23 Specifically, UCE 4599 asked about shoulder fired automatic weapons. SENATOR YEE responded by  
24 saying the automatic weapons are the equivalent to the "M16" Automatic Service Weapon. SENATOR  
25 YEE told UCE 4599 when you move a lot of "stuff" people notice you. SENATOR YEE said he told  
26 LIM if he were UCE 4599, he would not send a boat to the Philippines for 50 rifles. UCE 4599 asked  
27 about the availability of shoulder fire missiles or rockets. SENATOR YEE responded "I told him about  
28

1 rocket launchers and things like that.” SENATOR YEE asked UCE 4599 to provide an inventory list of  
2 desired weapons and he would see what they can do. According to SENATOR YEE, LIM wanted to  
3 know how UCE 4599 planned on remitting payment. UCE 4599 told SENATOR YEE he would deliver  
4 \$2,000,000 cash. UCE 4599 asked about larger scale weapons systems like artillery. SENATOR YEE  
5 explained Mindanao is a “war zone.” SENATOR YEE stated he had a conversation with his other  
6 proposed source of supply about the illegality of U.S. citizens purchasing weapons  
7 overseas. SENATOR YEE told UCE 4599 to be careful because this was “major stuff.” SENATOR  
8 YEE asked if this was the first time UCE 4599 had ever engaged in a weapons deal. UCE 4599 told  
9 SENATOR YEE his family used to source Russian made weapons through Canada. UCE 4599 told  
10 SENATOR YEE he understood the importance and impact of having SENATOR YEE as California  
11 Secretary of State to his family’s business. SENATOR YEE stated he thought there were multiple  
12 opportunities to help. SENATOR YEE continued by saying he thought Africa was a largely untapped  
13 market for trade. SENATOR YEE surmised by utilizing his position, UCE 4599 would be able to ship  
14 weapons directly to Africa.  
15

16  
17 UCE 4599 asked SENATOR YEE what the next steps were. SENATOR YEE replied by saying  
18 LIM would figure out if his SOS in the Philippines could provide the kinds of weapons UCE 4599 was  
19 looking to obtain. UCE 4599 reiterated his support for SENATOR YEE’s campaign. UCE 4599  
20 stressed the importance of completing the first weapons transaction. UCE 4599 told SENATOR YEE he  
21 was successful when his friends were successful. UCE 4599 reassured SENATOR YEE he would pay  
22 SENATOR YEE for his assistance in addition to the previously promised campaign  
23 donations. SENATOR YEE appreciated UCE 4599’s gesture and to focus on the election first. UCE  
24 4599 reiterated he would be picking the weapons up in the Philippines and shipping them back to the  
25 United States before ultimately sending them to North Africa. SENATOR YEE told UCE 4599 there  
26 are approximately 100 rifles currently available.  
27  
28

1 SENATOR YEE advised the Muslims in Mindanao had access to a lot of money and were being  
2 financed by Muammar Gaddafi before his death.

3 UCE 4599 asked to have a direct conversation with LIM. SENATOR YEE was hesitant and  
4 advised there wasn't anything that SENATOR YEE had told UCE 4599 that wasn't the  
5 truth. SENATOR YEE said LIM was a "gun lover" and had no moral arguments of selling weapons.  
6 SENATOR YEE reiterated he had been to Mindanao and had an opportunity to shoot some of the  
7 weapons discussed with UCE 4599. SENATOR YEE departed from the area. KEITH JACKSON and  
8 UCE 4599 had dinner at the restaurant within the hotel.  
9

10 On March 11, 2014, UCE 4599 met with KEITH JACKSON, SENATOR YEE and LIM at a  
11 restaurant in San Francisco, California, to discuss an arms trafficking transaction. At the restaurant,  
12 SENATOR YEE introduced LIM to UCE 4599 and described him as highly trusted individual. UCE  
13 4599 stressed the importance remaining safe during all aspects of the weapons trafficking deal. LIM  
14 told UCE 4599 the weapons could be shipped to Manila or to the Port of Cagayan de Oro, Philippines.  
15 LIM believed Manila would be the safest option. LIM said UCE 4599's contact in the Philippines  
16 would be LIM's nephew (not further identified). LIM continued by saying a Captain in the Philippine  
17 military (not further identified) would provide the weapons to LIM's nephew. LIM indicated he would  
18 prefer UCE 4599 put together a list of desired weapons. SENATOR YEE told UCE 4599 the weapons  
19 deal would not happen until after the California Secretary of State election. LIM and SENATOR YEE  
20 encouraged UCE 4599 to deal in smaller amounts of weapons to avoid unwanted attention in the  
21 Philippines. UCE 4599 asked about the major Muslim organizations in the Mindanao region of the  
22 Philippines. UCE 4599 asked about the major Muslim organizations in the Mindanao region of the  
23 Philippines. SENATOR YEE responded by saying "M.I.L.F." UCE 4599 understood M.I.L.F. to be an  
24 acronym for the MORO ISLAMIC LIBERATION FRONT. SENATOR YEE went on to explain there  
25 were several factions within the M.I.L.F. Regarding the M.I.L.F., LIM told UCE 4599 they are his  
26 friends but he does not personally associate with them.  
27  
28

1 UCE 4599 asked LIM about what specific weapons he had access to. LIM told UCE the Israeli  
2 made Tavor assault rifle was very common in the Philippines. LIM described the Tavor as being the  
3 equivalent of the "M16" assault rifle. UCE 4599 asked LIM if he had access to anything else "bigger."  
4 LIM responded by saying "All kinds of things, we just have to look for it." LIM was afraid to relay  
5 UCE 4599's request for weapons over the phone. UCE 4599 asked LIM if he would accompany UCE  
6 4599 to the Philippines. LIM asked UCE 4599 if he was wanted by law enforcement. LIM and  
7 SENATOR YEE warned UCE 4599 to be careful in the Philippines. SENATOR YEE believed there  
8 was a high probability of being kidnapped in the Philippines.  
9

10 UCE 4599 told LIM he would provide a list of desired weapons to KEITH JACKSON. LIM in  
11 turn, would hand deliver the letter to his nephew in the Philippines. SENATOR YEE said LIM would  
12 not go to the Philippines without SENATOR YEE and SENATOR YEE wasn't ready to go to the  
13 Philippines until November. SENATOR YEE explained "Once things start to move, it's going to attract  
14 attention. We just got to be extra-extra careful." While SENATOR YEE agreed with LIM's assessment  
15 of Manila being a safer location to pick up the weapons, SENATOR YEE said "We have more control  
16 in Cagayan de Oro than Manila. LIM asked if UCE 4599 could bring the money to the Philippines.  
17 UCE 4599 assured LIM it would not be a problem to transport the money to the Philippines. LIM  
18 advised UCE 4599 would meet with a head of a Muslim group.  
19

20 UCE 4599 asked about a recent peace treaty signed between the Philippine government and the  
21 Muslim rebel groups. According to SENATOR YEE, the Philippine government was secretly funding  
22 some of the Muslim rebel groups in an effort to create a distraction so people would not focus on all the  
23 corruption within the Philippine government itself. SENATOR YEE explained there are several factions  
24 within the M.I.L.F. who did not agree with the peace treaty. LIM reiterated the weapons would be  
25 provided by the Philippine military. UCE 4599 asked for weapons that were light, mobile and  
26 devastating.  
27  
28



1 UCE 4599 would provide LIM with a list of desired weapons. If LIM could not hand deliver the  
2 list to the Philippines himself he would have an associate from the San Francisco Bay Area deliver the  
3 letter. SENATOR YEE advised he and LIM needed time to set up the infrastructure necessary to  
4 complete the weapons deal. SENATOR YEE didn't want LIM to get too involved because he was a  
5 United States citizen. UCE 4599 reiterated a previous statement made by SENATOR YEE on March 5,  
6 2014, when SENATOR YEE said "I want to protect the entire enterprise." SENATOR YEE stated he  
7 wanted to build in several layers of protection to shield LIM and anyone else who may be involved with  
8 the weapons deal. SENATOR YEE was also worried about anybody detecting any "revenue streams"  
9 that may lead back to SENATOR YEE. UCE 4599 told SENATOR YEE he had a way to insulate any  
10 type of transaction associated with the weapons deal. LIM asked if UCE 4599 would have the  
11 capabilities to bring a ship over to the Philippines. UCE 4599 told LIM his family was in control of a  
12 large portion of the Port of Newark in New Jersey. LIM asked if UCE 4599 was in the Mafia. UCE  
13 4599 confirmed he was associated with the Mafia in New Jersey.  
14  
15

16 On March 14, 2014, UCE 4599 met with SENATOR YEE, KEITH JACKSON and KEITH  
17 JACKSON's associate at a restaurant in San Francisco, California. During the meeting, SENATOR  
18 YEE and KEITH JACKSON openly discussed how they would break up a large sum of cash provided  
19 by UCE 4599 into legitimate campaign donations. UCE 4599 told SENATOR YEE he was prepared to  
20 give him \$6,800 in cash and a list of weapons for him to give to LIM. YEE told UCE 4599 he would  
21 take the cash and have one of his children write out a check. Later in the evening, UCE 4599 walked  
22 with SENATOR YEE, and SENATOR YEE told UCE 4599 he would make a "Xerox" copy of the list  
23 and provide it to LIM. SENATOR YEE stated, LIM would in turn mail the list to his Philippine source  
24 of supply for weapons. **I believe that this demonstrates probable cause for a violation of Title 18,**  
25 **United States Code, Sections 371, 922(a)(1) and 922(l) by SENATOR YEE, KEITH JACKSON,**  
26 **and LIM.**  
27  
28

1           ***E. SCHEME TO DEFRAUD BY SENATOR YEE AND JACKSON***

2           During a substantial portion of the time that the criminal activities described above were taking  
3 place, that is from approximately May 2011 through the present, SENATOR YEE and KEITH  
4 JACKSON were engaged in campaign fundraising activities for SENATOR YEE. These activities  
5 included agreements by SENATOR YEE and KEITH JACKSON that SENATOR YEE would engage in  
6 official acts requested by donor undercover agents, UCE 4599, UCE 4773, and UCE 4180 in exchange  
7 for campaign donations and money.  
8

9           **Background Pertaining to the Honest Services Fraud**

10          As mentioned above, UCE 4599 and KEITH JACKSON met at a social gathering with CHOW  
11 on May 25, 2011. At this time, SENATOR YEE was serving as a State Senator for the California  
12 Eighth Senate District, which includes San Mateo County and part of San Francisco County.  
13 SENATOR YEE was also running for election in the San Francisco mayoral election to be held on  
14 November 8, 2011. KEITH JACKSON, who had purportedly known SENATOR YEE for many years,  
15 was raising money for SENATOR YEE's mayoral campaign, and solicited a \$500 donation from UCE  
16 4599 at the May 25, 2011 event. Five hundred dollars was the maximum allowed for a donation by an  
17 individual. KEITH JACKSON described his long-standing relationship with SENATOR YEE and how  
18 much money SENATOR YEE would control in the San Francisco budget once elected mayor. KEITH  
19 JACKSON explained that if UCE-4599 wanted to invest \$5,000 in SENATOR YEE, UCE-4599 would  
20 get credit for it.  
21  
22

23          UCE 4599 declined to make the requested donation, but on several more occasions in mid-2011,  
24 KEITH JACKSON continued to solicit UCE-4599 for contributions to the campaign. Each time, UCE-  
25 4599 responded that he was not interested, and eventually told KEITH JACKSON that he had a business  
26 associate from the East Coast who might be interested in making a contribution.  
27  
28

1 On September 20, 2011, KEITH JACKSON invited UCE-4599 to a fundraiser for SENATOR  
2 YEE. UCE-4599 said he would check with UCE-4773. UCE-4773 was an FBI undercover agent who  
3 was posing as a business associate of UCE-4599 who lived and worked in Atlanta. The following day,  
4 UCE 4773 spoke with KEITH JACKSON over the telephone. KEITH JACKSON told UCE 4773 that  
5 he wanted him to come to a fundraiser that night so that KEITH JACKSON could introduce UCE 4773  
6 to “a good friend of mine who’s running for mayor, Senator YEE, LELAND YEE.” UCE 4773 agreed  
7 to attend the event.  
8

9  
10 From the beginning of the investigation, and continuing throughout the investigation, UCE 4773  
11 presented himself as a businessman engaged in real estate development who also represents a variety of  
12 investors and clients. UCE 4773 has represented himself as particularly being interested in expanding  
13 his business interests to California in general, and the San Francisco Bay Area in particular, and in  
14 making business and political contacts who could facilitate that expansion.  
15

16 On September 21, 2011, UCE 4773 met KEITH JACKSON and SENATOR YEE in person at a  
17 fundraising event in San Francisco. In SENATOR YEE’s presence, UCE-4773 wrote out a check for  
18 \$500 as a campaign contribution.  
19

20 Starting with their first meeting with UCE 4773, SENATOR YEE and KEITH JACKSON  
21 vigorously courted UCE 4773 as a potential campaign donor and fundraiser. On September 22, 2011,  
22 while located in Atlanta, UCE 4773 received a voicemail from SENATOR YEE stating that he  
23 “appreciate[d] the conversation and then hopefully, um, you know, there are things that uh, we can do to  
24 be of help uh, to you, and uh, but anyway just wanted to reach out and say thank you very, very much.”  
25 On September 23, 2011, UCE 4773 received two calls from SENATOR YEE. During the first call,  
26 SENATOR YEE said he would like to discuss affordable housing with UCE 4773 – one of UCE 4773’s  
27 purported business interests – “particularly” once SENATOR YEE was elected mayor. During the  
28

1 second call, SENATOR YEE said that he could not talk policy at the same time he asked for money. At  
2 this point, SENATOR YEE asked UCE 4773 to raise \$5,000 to \$10,000 for SENATOR YEE's  
3 campaign. Senator YEE acknowledged the \$500 individual donation limit during the conversation.  
4

5 Over the course of their relationship and dealings for the remainder of the mayoral election, UCE  
6 4773 made it clear to both KEITH JACKSON and SENATOR YEE that he was prepared to assist them,  
7 but expected consideration in exchange in terms of furthering his own business interests.  
8

9 In response to SENATOR YEE's and KEITH JACKSON's requests for campaign donations, on  
10 October 11, 2011, UCE 4773 hand-delivered to KEITH JACKSON a \$5,000 personal check made  
11 payable to "JACKSON CONSULTANCY." In response to UCE 4773's concerns that SENATOR YEE  
12 would know that UCE 4773 had made the contribution and would get credit for it, KEITH JACKSON  
13 said that SENATOR YEE would be aware because JACKSON planned to tell him.  
14

15 On October 13, 2011, SENATOR YEE and KEITH JACKSON and others attended a meet and  
16 greet event attended by UCE 4773 and ten other undercover FBI agents. UCE 4773 arranged for each of  
17 the ten undercover agents to make a donation to SENATOR YEE of \$500 each, thereby raising \$5,000  
18 for SENATOR YEE's campaign.  
19

20 The following day, October 14, 2011, KEITH JACKSON called UCE 4773 and they discussed  
21 additional donations to SENATOR YEE's mayoral campaign. JACKSON hinted at wanting UCE 4773  
22 to contribute additional funds. UCE 4773 said he was interested in donating more money, but he would  
23 not do so without knowing what he would get in return.  
24

25 Later in the evening of October 14, 2011, following a telephonic invitation from SENATOR  
26 YEE, UCE 4773 met with SENATOR YEE at the coffee shop in the Marriot Marquis hotel in San  
27 Francisco. UCE 4773 discussed the fact that he had already provided \$11,000 to the campaign, and told  
28

1 SENATOR YEE, "it's too much money ... not to get something." UCE 4773 was not necessarily  
2 seeking specifics from SENATOR YEE at this time, but was seeking assurance that consideration would  
3 be forthcoming. SENATOR YEE immediately responded: "Right, right, right." SENATOR YEE told  
4 UCE 4773 about all the money he had raised over the years in connection with his career in the state  
5 Senate and his positions in the Senate: "...it gave me a lot of cachet in terms of being able to raise  
6 money, and also to be helpful when, you know, it was the right thing to do." At one point in the  
7 conversation, SENATOR YEE added that he had a lot of friends in Sacramento; he understood there  
8 was a lot that UCE 4773 wanted to do both at the state and local level; and said "there's tremendous  
9 opportunity in local levels, ... because whoever's gonna be the mayor controls everything."  
10  
11

12 During this conversation, UCE 4773 mentioned "the five" raised [through the "investors"] at the  
13 meet-and-greet the night before. UCE 4773 then referred to "the five that I gave KEITH [JACKSON],  
14 the separate five," and referred to worries raised by an article he saw in the newspaper about people  
15 getting caught donating over the \$500 limit to another mayoral candidate. UCE-4773 expressed concern  
16 about the risk he was running in being exposed and investigated. SENATOR YEE responded, "[Y]ou're  
17 right ... we gotta be careful." He added, "... you ought to be careful too." SENATOR YEE then said,  
18 "we've gotta get the money, but, you know, to the extent that you could find a way to do it, ... you know  
19 I would appreciate that." When UCE-4773 continued to express concern about putting a large sum into  
20 the campaign, SENATOR YEE said that the campaign was going to get audited "because we took public  
21 financing." He said that would include looking at where the money comes from, "and you just gotta be  
22 careful about that." SENATOR YEE added, "I would simply say that as long as you cover your tracks  
23 ... you're fine ... [b]ut if you don't think you can do that, don't do it."  
24  
25

26 When UCE 4773 asked if there was some way that he could contribute money "outside the  
27 campaign," and not have to be worried, SENATOR YEE said that UCE 4773 could contribute unlimited  
28

1 sums to a committee supporting a ballot measure for school funding that SENATOR YEE also  
2 supported. SENATOR YEE explained that the ads for the measure would feature SENATOR YEE in a  
3 positive piece supporting schools and education. At the end of the conversation, SENATOR YEE said  
4 that he wanted UCE 4773 to be comfortable with whatever he did, because for SENATOR YEE, "this is  
5 about a long term relationship." SENATOR YEE then mentioned that if he won the mayoral position,  
6 "we control 6.8 billion man, shit." SENATOR YEE told UCE 4773 that he had no interest in making  
7 money for himself, but was happy to have his friends make money. UCE 4773 recounted that "I'm at  
8 11,000 dollars," and said that there was no problem getting the money, he just did not want to get caught  
9 doing something stupid. SENATOR YEE responded, "[r]ight, and, like I said, you know, you get ten  
10 thousand into the campaign ... and then the other ten, you know, you can write it and dump it in the  
11 ballot measure, I don't care."  
12  
13

14 On several more occasions before the November 8, 2011 election, SENATOR YEE and KEITH  
15 JACKSON asked UCE 4773 for more money. UCE 4773 did not make any additional donations.  
16 Senator YEE lost the mayoral election on November 8, 2011.  
17

### 18 **Bribe Involving Well Tech**

19

20 During a meeting with SENATOR YEE and KEITH JACKSON on January 18, 2012,  
21 SENATOR YEE told UCE 4773 that he was considering running for Secretary of State in the November  
22 2014 election. SENATOR YEE said that he could not get started on fundraising for the Secretary of  
23 State election until he retired the \$70,000 debt from the San Francisco mayoral campaign. SENATOR  
24 YEE asked UCE 4773 to raise \$10,000 in order to retire the mayoral debt and also asked UCE 4773 to  
25 also donate to the Secretary of State campaign. UCE 4773 did not make any commitment.  
26  
27  
28



1 On April 7, 2012, UCE 4773 met with SENATOR YEE and KEITH JACKSON at the Starbucks  
2 located inside the Marriott Marquis hotel in San Francisco. They discussed UCE 4773's business  
3 interests, including a software consulting business client. UCE 4773 said he wanted to expand the  
4 client's business into California.

5  
6 On April 27, 2012, in response to continuing requests from KEITH JACKSON for donations to  
7 retire SENATOR YEE's mayoral campaign debt, UCE 4773 sent a personal check to KEITH  
8 JACKSON via Federal Express. The check was for \$5,000 and made payable to KEITH JACKSON.

9  
10 On June 2, 2012, UCE 4773 spoke with KEITH JACKSON over the phone. JACKSON told  
11 UCE 4773 that SENATOR YEE would like to meet with UCE 4773 the next time UCE 4773 was in  
12 town. According to JACKSON, SENATOR YEE's attitude was "whatever [UCE-4773] need[s] from  
13 him ...he's open to help as much as he can." The two discussed UCE 4773's software consulting  
14 company client, Well Tech, and JACKSON suggested using SENATOR YEE's contacts in San Mateo  
15 County to assist Well Tech. Well Tech was the name of the software consulting company client that  
16 UCE 4773 was seeking to expand to the San Francisco Bay Area. JACKSON stated, "just consider that  
17 an easy ask for Leland to kind of, you know, help identify, you know, especially in San Mateo County,  
18 where there's plenty of opportunities there..."

19  
20  
21 On June 6, 2012, UCE 4773 spoke on the phone again with KEITH JACKSON. JACKSON  
22 advised that SENATOR YEE's mayoral campaign debt was down to around \$31,000. JACKSON said  
23 that SENATOR YEE needed UCE 4773's help and wanted help by June 22, 2012. JACKSON stated  
24 that whatever UCE 4773 could do to help clear up the debt, "it'll be greatly, greatly appreciated." UCE  
25 4773 responded that he knew JACKSON could not discuss the subject on the phone, but UCE 4773 was  
26 going to need something very specific before giving more money. UCE 4773 added that he would need  
27 to meet and talk to SENATOR YEE directly. JACKSON asked UCE-4773 to call SENATOR YEE.  
28

1 UCE 4773 and KEITH JACKSON spoke again by phone on June 19, 2012, at which time  
2 JACKSON told UCE 4773 that SENATOR YEE needed \$40,000 and that SENATOR YEE's deadline  
3 to clear his debt was June 30. JACKSON asked UCE 4773 for \$10,000. When UCE4773 asked what  
4 SENATOR YEE's response was to UCE 4773 saying he would need to get something out of it,  
5 JACKSON said SENATOR YEE was fine with that.  
6

7 On June 26, 2012, UCE 4773, a Confidential Human Source (CHS #12), and UCE-4212 met  
8 with SENATOR YEE, KEITH JACKSON, and others at an office in Sacramento, California. UCE  
9 4212 was an FBI undercover agent posing as "SONJA SCHMIDT." CHS #12 was posing as an  
10 individual who runs a software consulting business. CHS #12 told SENATOR YEE that her business  
11 does information technology (IT) and management consulting in the area of business systems support  
12 and advised that her company has contracts with federal agencies. UCE 4773 explained to SENATOR  
13 YEE that he and his investors were providing funding to assist CHS #12 in expanding and competing for  
14 contracts in the state of California. UCE 4773 explained that UCE 4212 has a strong business  
15 background and would be helping CHS #12 as a business development manager in California. UCE  
16 4773 told SENATOR YEE that he was seeking to position CHS #12 to compete for contracts throughout  
17 the state of California and the City of San Francisco. UCE 4773 said that anyone could compete for  
18 contracts, but CHS #12 was "still going to need [to] access the relationships." SENATOR YEE  
19 discussed potential opportunities in San Mateo County and in the state of California, noting that certain  
20 state-wide computer systems, such as that of the courts, needed improvement. SENATOR YEE said  
21 that there were "two elements of Secretary of State that may be of interest to you." He explained that  
22 one was business development and another is in elections, where the computer system was antiquated.  
23  
24  
25

26 CHS #12 and UCE-4212 left the meeting and UCE 4773 continued to meet with SENATOR  
27 YEE and the others. UCE 4773 told SENATOR YEE that he and his investors planned to put \$500,000  
28

1 into CHS #12's company over the next five years. He added that he wanted to "identify opportunities  
2 for [CHS #12] to grow." In response to that statement, SENATOR YEE said, "Okay, let, let me just tell  
3 you my situation. My situation is that um, you know, we, we want to raise 40,000 and we've just been  
4 having a dog of a time. ... [y]ou know I know you've helped with 5,000 and so on. You know, what  
5 we're looking at is if you can help with another 10." SENATOR YEE said, "we were hoping to close by  
6 the end of the month." SENATOR YEE added if he did not close the mayoral debt by the end of the  
7 month, he was going to have to delay the announcement for Secretary of State. At the close of the  
8 meeting, SENATOR YEE told UCE-4773, "if you could be helpful, it would be really good."

10  
11 KEITH JACKSON telephoned UCE 4773 on July 2, 2012 and told him that SENATOR YEE  
12 was setting up meetings for Well Tech with a state public official involved in technology and with some  
13 individuals at the local level involved in transportation. JACKSON told UCE 4773 that SENATOR  
14 YEE "is moving forward; he gets it," and that SENATOR YEE said he will "make some things happen."

15  
16 On September 4, 2012, UCE 4773 met with SENATOR YEE and KEITH JACKSON in the  
17 cafeteria in the State Building at 455 Golden Gate Avenue in San Francisco. When UCE 4773 asked  
18 SENATOR YEE if he had announced for Secretary of State yet, SENATOR YEE replied "we're 32 out  
19 now. \$32,000 out ... from paying off the debt." SENATOR YEE then added, "[S]o, um, if you could  
20 do another 10, that would be good." UCE 4773 said that he had a meeting the next day with the state  
21 health department. UCE 4773 explained that he was meeting with the person in procurement who was  
22 "going to help [CHS #12] set up with at least the lead on a couple of contracts." UCE 4773 added, "I  
23 know we're gonna need a phone call or two on [CHS #12]'s behalf. I'll give you a call, um, to work out  
24 the details." SENATOR YEE responded: "Just let me know." SENATOR YEE also added that he  
25 planned to set up a meeting with UCE-4773 and [CHS #12] with the state-level technology person and  
26 mentioned that he, Senator YEE, had already met with this individual. UCE 4773 said that at the  
27  
28

1 meeting with the health department the next day, UCE 4773 would be pushing Well Tech and  
2 anticipated moving fast with the health department. UCE 4773 told SENATOR YEE, "[i]f you can do  
3 that, then 10 is no problem at all. I don't have a problem with that at all." SENATOR YEE responded  
4 by saying, "[s]o just let me know who you guys are meeting with and, uh, you know, uh, get that  
5 information to me so I'll make the call right away." UCE 4773 said, "[s]ounds good." A short time  
6 later in the conversation, UCE 4773 said he would call SENATOR YEE the next day after he found out  
7 to whom calls would need to be made. He then asked how soon SENATOR YEE needed "the 10," and  
8 SENATOR YEE responded "as soon as possible."  
9

10  
11 On September 10, 2012, SENATOR YEE left a voicemail for UCE 4773 asking for the name of  
12 the person at the California Department of Health whom UCE 4773 needed SENATOR YEE to call.  
13

14 On September 19, 2012, UCE 4773 spoke again with SENATOR YEE by telephone and said  
15 that Well Tech was looking to do business with the state Health Department and UCE 4773 needed a  
16 letter from SENATOR YEE talking about the efforts Well Tech had been making in the state.  
17 SENATOR YEE responded, "why don't you do this? Why don't you draft something for me? And then  
18 what I will do, is, is I will play with uh some of the words so that I can [unintelligible]. And what I'll  
19 do is, in a letter, I'll indicate the fact that, uh, you know, I, I met with whatever that gal's name was, and  
20 I was really impressed with her credentials, and the potential of her helping out individuals in my  
21 district, San Mateo County. And encouraging her to pursue ideas in the county, but in California, and  
22 try and help streamline the process and save us money."  
23

24 On September 20, 2012, UCE 4773 sent a proposed draft letter via e-mail to the e-mail account  
25 provided by SENATOR YEE. On the same date, UCE 4773 called SENATOR YEE and they discussed  
26 the letter. SENATOR YEE stated he would print the letter out, get it to his staff, and then get it back to  
27 UCE 4773 sometime next week with revisions.  
28

1 When KEITH JACKSON and UCE 4773 spoke on September 24, 2012, JACKSON told UCE  
2 4773 that SENATOR YEE was all over him to clean up the debt. UCE 4773 said later in the  
3 conversation that if SENATOR YEE could get him the letter, UCE 4773 would "hook" JACKSON up.  
4 JACKSON explained that SENATOR YEE wanted to move forward with UCE 4773, but he also wanted  
5 to be safe. UCE 4773 said he would not put any more money out there unless he was getting something.  
6 JACKSON agreed, stating, "I understand that and I think he understands that too."  
7

8 UCE 4773 and KEITH JACKSON spoke by phone again on September 26, 2012. JACKSON  
9 said, "I just ... you know, the Senator, I talked to him yesterday, uh, in regards to the letter. So, what he  
10 thought was that, you know, keep the letter as is, and whatever phone calls he needs to make ...".  
11 JACKSON stated, "'[c]ause he [Senator YEE] said he's comfortable making calls, whatever he needs to  
12 do. Uh, he said, it's just the letter thing is once you put it in writing, you just he, he, he didn't want it to  
13 seem like he's telling somebody, another state employee, that he just, they have to give you guys the  
14 contract. Just in case somebody else got upset about that, then it's public information .... And so he  
15 said, phone calls, whatever he needs to do, he, he'll, he'll do that. And he also wanted me to tell you  
16 that, he, he said he told me to tell you that, whatever, whatever you want, [UCE 4773], you got it. And  
17 so he just, he wants you to feel comfortable with that. You know, he just, he sees this as a long-term  
18 relationship and he don't, he don't you know, he don't want to fuck things up." UCE 4773 was located  
19 in Georgia, and JACKSON was located in San Francisco, California, during this call. **I believe this**  
20 **demonstrates probable cause for a violation of Title 18, United States Code, Sections 1343 and**  
21 **1346, and Section 2, by SENATOR YEE and JACKSON.**  
22  
23  
24

25 UCE-4773 and SENATOR YEE spoke by phone on September 27, 2012, at which time  
26 SENATOR YEE again asked UCE 4773 for money, and asked for it sooner rather than later. On  
27  
28

1 October 1, 2012, KEITH JACKSON called UCE 4773 and told UCE 4773 that SENATOR YEE was  
2 “blowing me up every day” with telephone calls and was on JACKSON’s “ass” to get more money.  
3

4 On October 18, 2012, UCE 4773 telephoned SENATOR YEE from Georgia and told SENATOR  
5 YEE that the contact at the California Department of Public Health who was helping UCE 4773 was  
6 named “RAVI.” SENATOR YEE was located in San Francisco, California, during this call. UCE 4773  
7 told SENATOR YEE that RAVI worked on the administration of grants, including a grant involving  
8 immunization services, and this was a great opportunity for Well Tech. UCE 4773 told SENATOR  
9 YEE that Well Tech does not have a strong presence in California and one of the things that would help  
10 would be for SENATOR YEE to call and vouch for SENATOR YEE’s relationship with CHS #12,  
11 SONJA [UCE 4212], and Well Tech, and state what SENATOR YEE thought they are capable of  
12 accomplishing. SENATOR YEE agreed and asked that UCE 4773 text him the name of the person to  
13 whom he would be speaking. UCE 4773 said that all he was asking for today was that SENATOR YEE  
14 participate in a conference call. UCE 4773 said he would set up the conference call and introduce the  
15 senator. Senator YEE agreed. **I believe this demonstrates probable cause for a violation of Title 18,**  
16 **United States Code, Sections 1343 and 1346, and Section 2, by SENATOR YEE and JACKSON.**  
17  
18

19 Shortly thereafter on October 18, 2012, a conference call took place between SENATOR YEE,  
20 UCE 4773, and UCE 4138. UCE 4138 was an FBI agent acting in an undercover capacity and posing as  
21 RAVI. UCE 4138 was located in Hawaii; UCE 4773 was located in Georgia; and SENATOR YEE was  
22 located in San Francisco, California, during this call. UCE 4138 said that he was a staff services  
23 manager with the Department of Public Health in Richmond, California. SENATOR YEE told “RAVI”  
24 that he had had an opportunity to meet with [CHS #12] and he understood that one of the challenges in  
25 California is dealing with technology. SENATOR YEE said that when UCE 4773 introduced him to  
26 [CHS #12] and her company’s abilities, that was pretty intriguing to SENATOR YEE. SENATOR YEE  
27  
28

1 told RAVI that "if we can try and look at [CHS#12's] capacity in her company and whatnot, I think that  
2 would be a tremendous boon for the state of California." SENATOR YEE said that he understood that  
3 RAVI was working with Well Tech on an immunization program, and said, "we should be supportive of  
4 that, uh, and hopefully it will be a fruitful, uh, relationship from them and California, and maybe there  
5 are other, uh, projects that we can engage them in." RAVI responded that this was just the question he  
6 wanted to ask and he was glad to hear that SENATOR YEE has a positive experience on this issue.  
7  
8 SENATOR YEE said that he thought there were many other projects that [CHS#12] and her folks could  
9 really be working on, "so let's just see how that goes." SENATOR YEE thanked RAVI for his time.  
10 While RAVI and UCE 4773 were still on the line, SENATOR YEE asked UCE 4773 if UCE 4773 was  
11 okay. UCE 4773 said that he was and would call the senator back. **I believe this demonstrates**  
12 **probable cause for a violation of Title 18, United States Code, Sections 1343 and 1346, and Section**  
13 **2, by SENATOR YEE and JACKSON.**  
14

15 After the call with Ravi ended, UCE 4773 called SENATOR YEE and thanked him. UCE 4773  
16 stated that Ravi had been trying to help them but that it had been moving slowly and Ravi had told him  
17 that anything to move it along would help. When UCE 4773 asked SENATOR YEE how everything  
18 else was going, SENATOR YEE said he was still trying to take care of the debt and it was taking a lot of  
19 time. SENATOR YEE then added that anything UCE 4773 could do would help with that.  
20

21 UCE 4773 did not provide a campaign donation to SENATOR YEE immediately after the  
22 October 18, 2012 phone call. Between November 14, 2012 and November 16, 2012, SENATOR YEE  
23 and KEITH JACKSON spoke on several occasions. During these conversations, SENATOR YEE  
24 complained about UCE 4773 asking for favors, but not giving anything in return. In a phone  
25 conversation between SENATOR YEE and KEITH JACKSON on November 14, 2012, JACKSON  
26 mentioned that he had just spoken to UCE 4773 and SENATOR YEE responded, "oh, good luck on that  
27  
28



1 one then, shit.” KEITH JACKSON explained that the letter for Well Tech was important to UCE 4773  
2 and asked SENATOR YEE for the letter, as a favor. SENATOR YEE responded that he talked to the  
3 guy [from the Public Health Department] and we’re “still not fine. Now he wants the letter and we’re  
4 still not going to be fine. There’s always going to be something else.” SENATOR YEE said that at this  
5 point, they would just raise the money without UCE 4773. When KEITH JACKSON pressed  
6 SENATOR YEE for the letter, SENATOR YEE asked what guarantees they had that UCE 4773 was not  
7 going to screw them again. SENATOR YEE went on to say, “but this guy is just jerking us around,  
8 man. Two months and [unintelligible] nothing. And then later he says okay, talk to the guy ... I already  
9 talked to the guy and then now, uh, you know, then the letter. When it is going to end?” KEITH  
10 JACKSON continued to press for the letter, and SENATOR YEE said he would work on it.  
11

12  
13 During a telephone conversation between SENATOR YEE and KEITH JACKSON on  
14 November 16, 2012, JACKSON asked about the letter and SENATOR YEE said it had to go through the  
15 “rules people.” JACKSON said if they could just get the letter, then UCE 4773 would do what he needs  
16 to do. SENATOR YEE responded, “[y]eah, well, you just tell [UCE 4773] to just do it. Come on,  
17 [UCE 4773].” SENATOR YEE complained that he was busy and “there’s got to be some trust around  
18 here man, shit.” He compared it to dating a woman, saying that you do this and I’ll do that. SENATOR  
19 YEE wondered whether UCE 4773 understood that if SENATOR YEE did not succeed, then UCE 4773  
20 would not have access. SENATOR YEE then referred to the eight years he would be in charge if he  
21 becomes Secretary of State.  
22

23  
24 During a phone conversation with KEITH JACKSON on November 16, 2012, UCE 4773 that he  
25 could not transfer enough money so he would have UCE 4599 give the money to JACKSON for  
26 SENATOR YEE.  
27  
28

1 On November 19, 2012, KEITH JACKSON met with UCE 4599 at the Waterbar restaurant in  
2 San Francisco. UCE 4599 paid JACKSON \$10,000 cash on behalf of UCE 4773. JACKSON stated  
3 that the money would be helpful in retiring SENATOR YEE's campaign debt. UCE 4599 told  
4 JACKSON that UCE 4773 called him and asked him to do this favor. UCE 4599 said that UCE 4773  
5 wanted to remind JACKSON that he was still waiting on "some letter." JACKSON responded, "[y]eah I  
6 got it." JACKSON reassured UCE 4599 that he had spoken with SENATOR YEE several times over the  
7 previous days and the letter was forthcoming.  
8

9  
10 On November 23, 2012, SENATOR YEE spoke to an aide who was keeping track of and  
11 accounting for campaign donations. SENATOR YEE verified that the aide had received the \$10,000  
12 from [UCE 4773].  
13

14 On January 13, 2013, KEITH JACKSON sent via e-mail to UCE 4773 the final version of the  
15 letter on behalf of Well Tech from SENATOR YEE. JACKSON's e-mail message to UCE 4773 stated:  
16 "Hi [UCE 4773], Please find the letter attached from the Senator and feel free to contact me for any  
17 questions or comments. Thanks, Keith" The letter attached to the e-mail message was on the California  
18 State Senate letterhead of Senator Leland Y. Yee, Ph.D., Eighth Senate District; dated January 11, 2013;  
19 and addressed to Sonja Schmidt at Well Tech. The letter read as follows:  
20

21 Dear Ms. Schmidt,

22 I was pleased to meet you and your associates again. I am also excited that you have located your  
23 business in California.

24 As I said in our meeting, your technology expertise is most needed in the State. Your ability to have  
25 computer systems communicate across agencies, departments, and jurisdictions increases the utility of  
information.

26 As a small and woman owned business, I encourage you to bring your skills to address the various  
27 challenges in California by competing for various government contracts.

28 I wish you the best. Please call if I can be of further assistance.

1 Sincerely,

2 Senator Leland Y. Yee, Ph.D.

3 California State Senate

4 A handwritten signature appeared below the word "Sincerely."

5  
6 **The Bribe Involving a State Senate Proclamation for the Chee Kung Tong**

7  
8 At the November 19, 2012 meeting between UCE 4599 and KEITH JACKSON, UCE 4599 not  
9 only paid the \$10,000 campaign donation requested by SENATOR YEE and KEITH JACKSON of  
10 UCE 4773. During the meeting, UCE 4599 raised an issue relating to Raymond "Shrimpboy" CHOW  
11 and an ankle monitoring device that CHOW was wearing. UCE 4599 said he wanted to help CHOW  
12 have the monitoring device removed, and asked KEITH JACKSON if he knew anyone in Sacramento  
13 who could assist. KEITH JACKSON said he thought SENATOR YEE could make a call on CHOW's  
14 behalf, but CHOW would also need a good attorney. KEITH JACKSON told UCE 4599 that the  
15 \$10,000 he just provided would be helpful in paying off SENATOR YEE's campaign debt. KEITH  
16 JACKSON said he had asked if UCE 4773 could assist in paying off the remaining \$5,000 in debt, but  
17 UCE 4773 declined. UCE 4599 told KEITH JACKSON that he -- UCE 4599 -- would be willing to  
18 assist SENATOR YEE in retiring the remainder of his debt if Senator YEE was willing to assist CHOW.  
19 JACKSON said he would discuss it with SENATOR YEE.  
20

21  
22 SENATOR YEE and KEITH JACKSON spoke by telephone later the same day. JACKSON  
23 told SENATOR YEE that "our friend Raymond" needed some help. They agreed to talk the next day.

24 The following day, November 20, 2012, KEITH JACKSON and SENATOR YEE spoke by  
25 telephone again. SENATOR YEE told JACKSON that on the following Monday, "we're going to put  
26 out a statement saying that we're going to run, we're going to open the account on Monday, and, um,  
27 and we're gonna start raising money for the Secretary of State. And your guys man, shit, they better  
28

1 hurry up because we met with that technology guy. Shit.” JACKSON advised SENATOR YEE that he  
2 received the money the previous day.

3 KEITH JACKSON told SENATOR YEE that he had a guy who wanted to help out CHOW by  
4 having SENATOR YEE put a call in for him. SENATOR YEE asked who JACKSON’s guy was and  
5 JACKSON responded that it was a business partner of UCE 4773, [UCE 4599]. JACKSON stated that  
6 somebody, maybe the FBI, had CHOW “by the balls.” JACKSON then asked SENATOR YEE if he  
7 could talk on his private line, and SENATOR YEE called JACKSON back on one of his home telephone  
8 lines. JACKSON advised SENATOR YEE that UCE 4599 would clear up the rest of the debt, but  
9 wanted to know if SENATOR YEE could put in a good word for CHOW somewhere down the line.  
10 SENATOR YEE expressed concern because CHOW wanted to publicize and glamorize his life through  
11 a book and movie, and added, “[y]ou know, some people still think that he killed that Allen Leung guy.”  
12 In a follow-up telephone conversation between SENATOR YEE and JACKSON later the same day,  
13 SENATOR YEE said that CHOW is a gangster, part of a Tong, and should lay low. SENATOR YEE  
14 finally said, “shit, as much as I want that five thousand, I can’t do that man. Shit. Fuck. Shit.”

17 During a phone conversation on December 3, 2012, KEITH JACKSON spoke to UCE 4599  
18 about the prospect of SENATOR YEE helping CHOW. JACKSON told UCE 4599 that SENATOR  
19 YEE believed CHOW should “just chill” right now. Then, if things calm down for a while, SENATOR  
20 YEE would “be ready to step in.”

22 On December 7, 2012, KEITH JACKSON met with UCE 4599 in San Francisco. JACKSON  
23 stated that he had a conversation with SENATOR YEE in which JACKSON described UCE 4599 as a  
24 “good guy” and advised SENATOR YEE that he should meet UCE 4599. JACKSON said that he hoped  
25 to quickly raise \$50,000 for SENATOR YEE’s Secretary of State campaign, and wanted UCE 4599’s  
26 assistance. Later in the conversation, while discussing CHOW, JACKSON apologized for SENATOR  
27 YEE being unable to assist CHOW pursuant to UCE 4599’s request. JACKSON stated, “[h]e wants to  
28

1 help. Leland, uh, he tries to be so conservative sometimes.” UCE 4599 told JACKSON that he  
2 understood the request may be too risky for SENATOR YEE.

3       On January 22, 2013, UCE 4599, SENATOR YEE, and KEITH JACKSON had drinks at the  
4 Waterbar restaurant in San Francisco. This was SENATOR YEE’s first introduction to UCE 4599. UCE  
5 4599 described himself as being in private wealth management. SENATOR YEE asked UCE 4599 how  
6 he knew CHOW and UCE 4599 answered that he had met CHOW through a close associate in New  
7 York and that his organization was thinking about bankrolling CHOW’s book and movie deals.  
8 SENATOR YEE stated that CHOW needed to stay low-key. UCE 4599 told SENATOR YEE that he  
9 wanted to get a proclamation from SENATOR YEE’s office acknowledging the CHEE KUNG TONG’s  
10 165th anniversary. SENATOR YEE said he could do that for the association. He added that he was  
11 concerned CHOW would hold a press conference about it. JACKSON assured SENATOR YEE that  
12 CHOW would not do that. SENATOR YEE stated “what we have to do on our side is be careful ... you  
13 know, because uhm, this guy [CHOW] told on his friends.” [This was likely a reference to an earlier  
14 federal prosecution of CHOW during which CHOW cooperated with the authorities in exchange for a  
15 reduced sentence]. After SENATOR YEE left the meeting, JACKSON told UCE 4599 that SENATOR  
16 YEE “wants to be safe.” UCE 4599 told JACKSON if SENATOR YEE provided the proclamation on  
17 behalf of the Tong, UCE 4599 would write a check.

18       On February 12, 2013, SENATOR YEE and KEITH JACKSON spoke on the telephone.  
19 SENATOR YEE instructed JACKSON to “start collecting the checks” from UCE 4599 “now.”

20       On February 14, 2013, KEITH JACKSON called UCE 4599 and told him that SENATOR YEE  
21 was going to do the proclamation and bring it to the CHEE KUNG TONG celebration dinner which was  
22 being held on March 29, 2013. UCE 4599 responded, “[y]ou told him I’ll give him a check then, right?  
23 Or shortly thereafter?” JACKSON stated “yeah, whatever, we’ll do something afterwards. I just wanta  
24 try to do a fundraiser for him.”  
25  
26  
27  
28

1 SENATOR YEE and KEITH JACKSON spoke on the morning of February 26, 2013 and  
2 discussed the fact that SENATOR YEE's competitor in the Secretary of State race was ahead in  
3 fundraising. JACKSON discussed UCE-4599 having "three guys that would do \$6,800." SENATOR  
4 YEE replied, "[s]o if he if he can get, if he can get ten man, that would be 60,000, that would be great,  
5 that would really help us." When JACKSON asked what Senator YEE meant, SENATOR YEE  
6 clarified that he would like UCE 4599 to get "ten individuals at 6,800 each."

7  
8 Later the same day, KEITH JACKSON spoke to UCE 4599 on the telephone. UCE 4599 asked,  
9 "[g]ot that cat up in Sacramento working for me or what? Is he going to do that thing?" JACKSON  
10 responded, "[g]ot the proclamation, put it in a nice little glass kind of thing. He [SENATOR YEE]  
11 won't be there because he has a fundraiser in LA, but he's going to send it [unintelligible] with [a staff  
12 member] and [he'll/she'll] present it. Is that cool?" UCE 4599 responded, "[h]ey man, that's all right  
13 with me."

14  
15 Later on February 26, 2013, KEITH JACKSON and SENATOR YEE spoke again and  
16 SENATOR YEE said, "[o]n Shrimpboy ... [y]ou just got to be careful, [UCE-4599] supports him.  
17 That's okay, I don't care. But, you know, let's not get too close, okay?" JACKSON responded, "[y]eah,  
18 just ah, you do a proclamation, right?" SENATOR YEE said, "No, we're going to do a proclamation,  
19 don't tell anybody, but we're going to do a proclamation not to Shrimpboy, but to the organization."  
20 JACKSON said, "[y]eah, that's what he wants." SENATOR YEE then said, "No, no, but, but, I mean,  
21 in general, because he's still hot stuff. I just talked to some of the you know people who, you know, in  
22 the families, and, you know, he's still hot stuff. So we just gotta be careful, man."

23  
24 On March 6, 2013, KEITH JACKSON spoke on the phone with CHOW. CHOW said, "I heard  
25 Leland is going to be busy. He cannot come to my function." JACKSON replied, "Yeah, I know. He's  
26 going to be out of town. He's going to send his staff. He's going to give a plaque to the organization."  
27 CHOW said, "Oh, ok." JACKSON added, "Yeah. You don't want it to you, right? You don't want it  
28

1 to you. You just want it to the organization right?" CHOW responded, "Yeah, to my organization and  
2 also to my members from New York."

3 On March 29, 2013, one of SENATOR YEE's staff members attended the CHEE KUNG TONG  
4 anniversary celebration dinner at the New Asia Restaurant in Chinatown and presented a framed  
5 proclamation on California State Senate letterhead. In presenting the proclamation, the staff member  
6 said that he/she was officially presenting the proclamation from SENATOR YEE. CHOW was one of  
7 the attendees at the dinner.  
8

9 During April 2013, SENATOR YEE and KEITH JACKSON continued to have telephone  
10 discussions about the money they expected from UCE 4599. On April 30, 2013, JACKSON and  
11 SENATOR YEE discussed to whom UCE 4599 should make the check payable. SENATOR YEE said  
12 it should be made payable to "Leland Yee Secretary of State."  
13

14 On April 30, 2013, UCE 4599 and KEITH JACKSON exchanged text messages in order to  
15 coordinate a meeting so that UCE 4599 could deliver the check. The following day, on May 1, 2013,  
16 JACKSON texted UCE 4599 and advised him to make the check out to "Leland Yee. For Secretary of  
17 State." JACKSON sent and received these text messages via his T-Mobile account. T-Mobile has  
18 confirmed that any such text messages would have been routed electronically through the state of  
19 Washington. JACKSON was located in San Francisco when he sent the May 1, 2013 text. **I believe**  
20 **this demonstrates probable cause for a violation of Title 18, United States Code, Sections 1343 and**  
21 **1346, and Section 2, by SENATOR YEE and JACKSON.**  
22

23 On May 6, 2013, UCE 4599 met with KEITH JACKSON and his son, BRANDON JACKSON.  
24 During the meeting, UCE 4599, KEITH JACKSON, and BRANDON JACKSON discussed a weapons  
25 deal. In addition, UCE 4599 delivered a check to JACKSON for \$5,000 made payable to "Leland Yee  
26 Secretary of State." UCE 4599 told JACKSON he believed CHOW was happy with the presentation of  
27 the proclamation to the CHEE KUNG TONG.  
28



1 On May 9, 2013, KEITH JACKSON called UCE 4599 and then handed the phone to SENATOR  
2 YEE. SENATOR YEE thanked UCE 4599 for the donation, and said they should sit down together and  
3 keep the relationship. UCE 4599 told SENATOR YEE that he was welcome and added that if he could  
4 do anything else for SENATOR YEE, SENATOR YEE should let him know. SENATOR YEE  
5 responded that he wanted to make sure UCE 4599 was comfortable working with JACKSON. UCE  
6 4599 said that he was.

8 On June 6, 2013, UCE 4599 had dinner with KEITH JACKSON and SENATOR YEE. During a  
9 conversation about CHOW and CHOW's desire to make a movie and/or book about his life, UCE 4599  
10 told SENATOR YEE that he appreciated the proclamation, saying it was a "nice gesture." The  
11 following day, JACKSON and SENATOR YEE spoke on the telephone about UCE 4599 and why he  
12 wanted to stay invisible. SENATOR YEE joked that UCE 4599 must have drug money. JACKSON told  
13 SENATOR YEE that UCE 4599 wanted to do more, "he wants to help you." SENATOR YEE  
14 responded, "yeah, man, yeah, so you should just tell him to start getting us the money man, that's all."

16 During a telephone conversation with KEITH JACKSON on July 4, 2013, SENATOR YEE  
17 asked if UCE 4599 had given JACKSON "more stuff yet." SENATOR YEE then clarified: "I mean  
18 checks and so on?"

19 On July 11, 2013, UCE 4599 gave KEITH JACKSON a check for \$1,800 made payable to  
20 "Leland Yee for Secretary of State." That same day, JACKSON told SENATOR YEE about UCE  
21 4599's check.

### 23 **Bribe Involving Medical Marijuana Legislation**

24 During the course of the investigation, another undercover FBI agent, UCE 4180 was introduced  
25 to SENATOR YEE and KEITH JACKSON. UCE 4180 represented himself as a businessman involved  
26 in the medical marijuana business in Arizona. He told SENATOR YEE and JACKSON that he was  
27 seeking to expand to California and was particularly interested in statewide legislation in California that  
28

1 would regularize the industry and contain provisions that would be favorable to his business model.  
2 UCE 4180 told SENATOR YEE and JACKSON that he was prepared to make contributions to  
3 SENATOR YEE's Secretary of State campaign in exchange for SENATOR YEE introducing UCE 4180  
4 to state legislators who had a role in medical marijuana legislation and for SENATOR YEE's support of  
5 UCE-4180's interests.  
6

7 On March 14, 2013, an FBI confidential human source (CHS#11) who was posing as a business  
8 associate of UCE 4773, introduced UCE 4180 to SENATOR YEE at a face-to-face meeting in a  
9 Starbucks at the Marriott Marquis hotel in San Francisco. UCE 4180 told SENATOR YEE and  
10 JACKSON, who was also present, that he wanted to be the "Anheuser-Busch" of medical marijuana.  
11 UCE 4180 said he wanted to be able to come to California and operate legally under legislation allowing  
12 him to do so. SENATOR YEE said that he knew Asian farmers who grew marijuana and Vietnamese  
13 individuals who sold to dispensaries. SENATOR YEE said that he was pessimistic that any legislation  
14 would happen this year. However, if it did, it would be by ballot initiative, and as Secretary of State, he  
15 could help with ballot initiatives. CHS#11 mentioned that JACKSON asked him about retiring some of  
16 SENATOR YEE's debt. UCE 4180 stated that he would like to see something done about the debt so  
17 that SENATOR YEE could focus his efforts on UCE 4180's concerns.  
18

19 In a follow-up call later the same day, KEITH JACKSON told CHS #11 that if UCE 4180  
20 wanted to help retire SENATOR YEE's mayoral campaign debt, CHS #11 could put money in  
21 JACKSON's account, and then JACKSON would take care of it. JACKSON said that SENATOR YEE  
22 would know the money came from UCE 4180.  
23

24 On March 20, 2013, UCE 4180 arranged for a cash deposit of \$2,500 to KEITH JACKSON's  
25 bank account. That same day, CHS #11 talked with JACKSON and JACKSON indicated he knew the  
26 money was from UCE 4180 to help clear Senator YEE's mayoral debt and have Senator YEE focus on  
27 UCE-4180's needs.  
28

1 On April 6, 2013, KEITH JACKSON, UCE 4180, and CHS #11 met at a fundraiser for  
2 SENATOR YEE at a banquet hall in San Francisco. JACKSON acknowledged UCE 4180's payment  
3 and stated "he greatly appreciates it," referring to SENATOR YEE. UCE 4180 stated that "the state is  
4 going to have to take a stand" regarding medicinal marijuana legislation, to which JACKSON replied  
5 "and he's willing to play the game," again referring to SENATOR YEE. UCE 4180 responded that that  
6 was the statement he was looking for, and it meant "we can get into business together."

7  
8 As people left the fundraiser, SENATOR YEE joined the group and ushered them to a table at  
9 the end of the banquet hall. UCE 4180 explained to SENATOR YEE his long-term operation plan and his  
10 interest in state legislation. SENATOR YEE stated that since their last meeting, he met with his friend  
11 who is the executive director of a marijuana dispensary and learned all about how it works. SENATOR  
12 YEE told UCE-4180 that a state legislator, hereafter referred to as State Senator 1, was in an oversight  
13 position on the issue of medical marijuana legislations. During this meeting, SENATOR YEE said that  
14 he did not want to gain personally or financially from any venture with UCE 4180, but rather he was in  
15 it to help his friends. At one point, UCE 4180 asked SENATOR YEE, "how do we get you elected?"  
16 SENATOR YEE responded, "I'm going to leave that to what you think you can handle. But whatever  
17 fundraising you can do, I would appreciate it." After SENATOR YEE left the conversation, UCE 4180  
18 asked what he gets for his money, and JACKSON responded "access to him," referring to SENATOR  
19 YEE. CHS #11 told UCE 4180 that he had been asked for \$50,000 for SENATOR YEE's campaign.  
20 JACKSON told UCE 4180 that he needed somebody on the state level who can push the legislation,  
21 someone "who is not afraid to push it."

22  
23  
24 On April 8, 2013, KEITH JACKSON spoke with CHS #11 and told him that SENATOR YEE  
25 thought UCE 4180 was a great guy and SENATOR YEE was ready to move forward. JACKSON stated  
26 he was in SENATOR YEE's office at the time. Later in the day, during another conversation between  
27 JACKSON and CHS #11, JACKSON stated that SENATOR YEE wanted to see if UCE 4180 could  
28

1 raise \$20,000 for the Secretary of State campaign. JACKSON said UCE 4180 would have to “float” the  
2 money through JACKSON and then JACKSON would “do what I do.”

3 On April 24, 2013, UCE 4180 spoke with KEITH JACKSON and asked if JACKSON had a  
4 bank account where he could deposit a small donation to SENATOR YEE to show “good faith.”  
5 JACKSON stated he would text an account number and also assured UCE 4180 that his name would  
6 never be associated with Senator YEE’s campaign. UCE-4180 asked if he made a large donation, “what  
7 are the deliverables ... associated with that?” JACKSON advised UCE 4180 that SENATOR YEE was  
8 ready and willing to grab the issue of medical marijuana. JACKSON said he would provide specific  
9 outcomes when UCE 4180 came to California. Later that day, FBI agents observed SENATOR YEE  
10 and JACKSON meeting.  
11

12 The next day, April 25, 2013, KEITH JACKSON sent a text-message to UCE-4180 via  
13 JACKSON’s T-Mobile account which read, “Good Morning, [UCE 4180], per your request, here is my  
14 account info ... Jackson Consultancy Bank of America [account number] ...” and also provided his  
15 business address in San Francisco. 2075 California Street San Francisco Ca, 94109.” Per information  
16 received from T-Mobile, transmission of this text message would have been routed through Washington  
17 state. JACKSON was located in San Francisco, California when he sent the text. **I believe this**  
18 **demonstrates probable cause for a violation of Title 18, United States Code, Sections 1343 and**  
19 **1346, and Section 2, by SENATOR YEE and JACKSON.**  
20  
21

22 Later the same day, KEITH JACKSON advised UCE 4180 that SENATOR YEE wanted to have  
23 a private conversation with UCE 4180 when UCE 4180 came out to visit in May. JACKSON stated that  
24 he had spoken with SENATOR YEE and SENATOR YEE was going to be as helpful as he could.  
25 During this call, UCE 4180 also confirmed that he had received JACKSON’s text message with his bank  
26 account information.  
27  
28

1 On April 29, 2013, UCE 4180 made a direct cash deposit of \$3,000 into KEITH JACKSON's  
2 bank account.

3 On May 9, 2013, CHS #11 met with KEITH JACKSON and SENATOR YEE at the Starbucks in  
4 the Marriott Marquis hotel in San Francisco. During the meeting, CHS #11 asked to speak with  
5 SENATOR YEE privately, at which point JACKSON got up and left the table for a few minutes. When  
6 CHS #11 mentioned to Senator YEE that UCE 4180 had given a total of \$5,500 intended for SENATOR  
7 YEE, SENATOR YEE replied, "I haven't gotten any of that." Regarding UCE 4180, Senator YEE  
8 stated that he is a politician, he is not going to jail, he is going to play strictly by the rules, and the rules  
9 say that he cannot make money. Senator YEE added that the donation is to help get him elected.  
10 Senator YEE told CHS #11: "By helping me get elected means, I'm gonna take actions on your behalf.  
11 That's one thing you gotta understand."  
12

13 On May 10, 2013, CHS #11 spoke on the telephone with SENATOR YEE. Due to technical  
14 issues, this call was not recorded. CHS #11 asked SENATOR YEE to contact State Senator 1 in order  
15 to express SENATOR YEE's support for legislation which would require medical marijuana  
16 dispensaries to have a medical doctor on staff. CHS #11 informed SENATOR YEE that it would benefit  
17 UCE 4180 if state legislation set high barriers of entry, such as requiring a medical doctor on staff, that  
18 would make it more difficult for small operators to open a business. CHS #11 offered SENATOR YEE  
19 \$10,000 to \$15,000 if SENATOR YEE was willing to make the call to State Senator 1. According to  
20 CHS #11, SENATOR YEE agreed although he said that he could not make money for himself as part of  
21 the arrangement.  
22

23 On May 11, 2013, KEITH JACKSON and SENATOR YEE spoke on the telephone and  
24 discussed SENATOR YEE's meeting with CHS #11. JACKSON asked SENATOR YEE if he had made  
25 a call to State Senator 1 yet. Senator YEE responded, "[s]hit. That's pay to play and you can't do that.  
26  
27  
28

1 You cannot connect. You could go to jail for that. ... They got to understand, it's about the long term.  
2 It's not about the short term."

3 On May 14, 2013, SENATOR YEE and KEITH JACKSON spoke on the phone again.  
4 SENATOR YEE told JACKSON that he had not talked to State Senator 1 yet, but asked if UCE 4180 [  
5 or CHS 11] was "going to give us the, the stuff or not." JACKSON responded, "[y]eah, yeah, I think  
6 once, once he gets, you know, that the first issue [State Senator 1]. The second issue, I think he, after  
7 that he'll do whatever he needs to do. And so, he was still confused, so Leland, I think the best thing for  
8 these guys to do is go ahead and just write a check for 6,800 bucks." SENATOR YEE responded,  
9 "[y]eah, yeah, they should, they should be doing that, right? ... That's what we want them to do." Later  
10 in the discussion, SENATOR YEE mentioned CHS #11 again and said: "Just give me the goddam  
11 money, man shit," ... "you should just tell them, write some fucking checks, man." At one point in the  
12 conversation, JACKSON asked Senator YEE, "[i]s that hard to do with [State Senator 1]?" Senator  
13 YEE responded: "No, I mean, I, I, I can ask him, you know, um, about the, uh, you know when we're  
14 going to do uh, what uh, these uh medicinal marijuana, you know we got to have doctors there, and I'll  
15 just ask, and he says yeah, that's fine, I'll just yeah ... But I need to see him." Senator YEE said that he  
16 expected to see State Senator 1 that day.  
17

18  
19 On May 16, 2013, SENATOR YEE again instructed KEITH JACKSON to get money out of  
20 CHS #11 and UCE 4180. SENATOR YEE told JACKSON that SENATOR YEE thought what he could  
21 do regarding UCE 4180 is "be sorta the bad guy and say, look, you know [UCE 4180], you know, I can't  
22 do pay to play. You know, I mean, this is a long-term investment, uhm, you know, I wanna work with  
23 you. I think you're a great guy, I think we can really help each other, but the only way you're gonna,  
24 I'm gonna be able to help you, long-term, is if I become Secretary of State."  
25

26 On May 17, 2013, UCE 4180 and another FBI undercover employee, UCE-3357, posing as UCE  
27 4180's business partner, met with KEITH JACKSON, SENATOR YEE, and a guest of SENATOR YEE  
28

1 for dinner at Alexander's Steakhouse in San Francisco. During the dinner, UCE 4180 discussed CHS  
2 #11's offer to pay \$10,000 to SENATOR YEE to reach out to State Senator 1. SENATOR YEE stated  
3 he was not interested in money, but rather wanted his friends to benefit from his work. Not long after  
4 SENATOR YEE made that statement, UCE 4180 gave SENATOR YEE an envelope containing \$5,000  
5 in cash. SENATOR YEE asked, "[i]s there a check?" and UCE 4180 stated, "[i]t's not a check . . . I  
6 thought we already discussed that. I don't do checks." SENATOR YEE and JACKSON then went on  
7 to discuss UCE 4180's interests in medical marijuana legislation in California. UCE 4180 provided  
8 JACKSON and Senator YEE with a written proposal purported to have been prepared by a political  
9 consulting agency that suggested provisions UCE 4180 wanted to see in medical marijuana legislation,  
10 such as having a doctor available for consultation on-site.  
11

12 On the evening of May 20, 2013, SENATOR YEE and JACKSON spoke on the phone and  
13 arranged to meet at a coffee shop in San Francisco. Approximately thirty minutes later, JACKSON  
14 telephoned UCE 4180 and told UCE 4180 that he was with SENATOR YEE. JACKSON then gave the  
15 phone to SENATOR YEE. SENATOR YEE told UCE 4180 that he wanted to give UCE 4180 "the  
16 update," and went on to inform UCE 4180 about the status of two bills pertaining to medical marijuana  
17 pending in the California Assembly and Senate. UCE 4180 was located in Phoenix, Arizona during this  
18 call. During the evening of the same day, FBI agents observed JACKSON and Senator YEE meeting at  
19 a coffee shop in San Francisco. **I believe this demonstrates probable cause for a violation of Title**  
20  
21 **18, United States Code, Sections 1343 and 1346, and Section 2, by SENATOR YEE and**  
22 **JACKSON.**  
23

24 On May 27, 2013, SENATOR YEE and KEITH JACKSON spoke on the telephone about how  
25 they could set up some meetings for UCE 4180 in Sacramento. JACKSON and SENATOR YEE  
26 agreed to discuss the subject further in person. Later that evening, at approximately 6:55 p.m., FBI  
27 agents observed JACKSON and SENATOR YEE meeting at a Starbucks in San Francisco.  
28



1 On June 4, 2013, the FBI conducted a search warrant at the Senate office of California State  
2 Senator Ron Calderon in Sacramento. The same day, SENATOR YEE and KEITH JACKSON spoke on  
3 the phone about the search. SENATOR YEE told JACKSON, “[y]eah man, got to be really, real  
4 careful. Got to double check, triple check everything.” The next day, SENATOR YEE again instructed  
5 JACKSON to be careful and that they needed to talk to UCE 4180 and instruct him: “[y]ou gotta be  
6 careful about this stuff. This big stuff.”  
7

8 On June 7, 2013, UCE 4180 sent an e-mail to KEITH JACKSON stating that he was frustrated  
9 with JACKSON and what JACKSON had produced so far. UCE-4180 wrote that he had paid money to  
10 JACKSON and SENATOR YEE and so far there was nothing motivating UCE 4180 to pay more. UCE  
11 4180 asked JACKSON to have SENATOR YEE set up a meeting with other legislators on the medical  
12 marijuana issue.  
13

14 Later the same day, KEITH JACKSON e-mailed UCE 4180 to let him know that SENATOR  
15 YEE had set up a meeting with State Senator 1 in Sacramento on June 20, 2013 to discuss the issue of  
16 medical marijuana.  
17

18 On June 9, 2013, SENATOR YEE and KEITH JACKSON had a conference call with UCE  
19 4180. Senator YEE stated that it was tense in the Capitol right now and that you had to assume  
20 everyone was “wearing a wire.” SENATOR YEE went on to say that he was going to try to keep  
21 helping UCE 4180, and added that medical marijuana was a long-term issue and would probably be  
22 dealt with by the next generation of legislators. UCE 4180 asked that SENATOR YEE set up a meeting  
23 with a specific legislator, to which SENATOR YEE responded that he would see what he could do.  
24 However, SENATOR YEE discouraged UCE 4180 from meeting that particular legislator because that  
25 legislator lacked the political clout to make a difference. Alternatively, SENATOR YEE offered to set  
26 up a meeting with State Senator 1.  
27  
28

1 On June 20, 2013, UCE 4180, UCE 3357, SENATOR YEE, and KEITH JACKSON met in  
2 SENATOR YEE's Senate office in Sacramento, California. During the meeting, SENATOR YEE  
3 discussed the difficulty of passing medical marijuana legislation in California. SENATOR YEE stated  
4 he had set up a meeting with State Senator 1.

5 At the meeting on June 20, 2013, UCE 4180 told SENATOR YEE he was willing to make  
6 campaign contributions to secure the support of legislators. SENATOR YEE responded by stating,  
7 "[y]ou can't do that, man, you go to jail for that." SENATOR YEE explained that you cannot link  
8 contributions with any items, bills or amendments. At the end of the meeting, SENATOR YEE asked  
9 UCE 3357 to keep UCE 4180 in check because he could get them all in trouble. SENATOR YEE then  
10 accompanied UCE 4180, UCE 3357 and JACKSON on the walk to a nearby café to meet with State  
11 Senator 1. During the walk, SENATOR YEE stated, "I'm just trying to run for Secretary of State, I  
12 hope I don't get indicted."  
13

14 On June 20, 2013, UCE 4180, UCE 3357, SENATOR YEE and KEITH JACKSON met with  
15 State Senator 1 at a café in Sacramento. SENATOR YEE told State Senator 1 that the UCEs were  
16 interested in the medical marijuana issue, and were seeking high barriers to entry. SENATOR YEE  
17 explained how he was "warming up" to the issue of medical marijuana because sick people in his  
18 community needed it.  
19

20 The next day, on June 21, 2013, KEITH JACKSON met with UCE 4180 and UCE 3357 in the  
21 UCEs' hotel room in San Francisco. JACKSON told UCE 4180 that SENATOR YEE was nervous  
22 about discussing money in front of the people with whom they had meetings. UCE 4180 said he  
23 understood and asked if he could talk money with SENATOR YEE directly, in private. JACKSON  
24 responded, "[a]s long as we have it among ourselves, we're cool." JACKSON said SENATOR YEE  
25 wanted to be helpful, and JACKSON would have to spend a lot of time in Sacramento having meetings.  
26 JACKSON also agreed to attempt to set up meetings with additional legislators. UCE 4180 stated that  
27  
28

1 he would give cash commensurate with performance. Later in the meeting, UCE 4180 declared that he  
2 only wanted to give cash in exchange for SENATOR YEE's actions [as opposed to checks], because  
3 "it's not legitimate money." UCE 4180 told JACKSON that he would provide additional money in  
4 order to assist in breaking up the cash donations. JACKSON responded, "I'll have a conversation with  
5 him tonight," but advised "[t]hey watch everything you do and how you document it." JACKSON  
6 stated "I've got to talk to [SENATOR YEE's] guy and figure it out." JACKSON stated, "Leland will  
7 play, but he gets kinda nervous in conversations around certain people."

9 The following day, June 22, 2013, SENATOR YEE and KEITH JACKSON met with UCE 4180  
10 and UCE 3357 in the UCEs' hotel room in San Francisco. This meeting was consensually recorded on  
11 both audio and video. The group discussed the status of medical marijuana policy and the politics of  
12 state marijuana regulation. UCE 4180 took an envelope containing \$11,000 in cash and put it on the  
13 table in front of SENATOR YEE and JACKSON. UCE 4180 stated, "[t]his is a campaign donation and  
14 Keith and you can talk about that. That's for the meeting with [State Senator 1]." UCE 4180 said his  
15 contributions were "not coming in the form of checks." The envelope remained on the table for the  
16 duration of the meeting. The conversation during the meeting focused for the most part on a pending bill  
17 on another topic in which SENATOR YEE thought UCE 4180 would be interested. As SENATOR  
18 YEE and JACKSON got up to leave, SENATOR YEE made a gesture to JACKSON toward the  
19 envelope of cash, but JACKSON did not see the gesture. SENATOR YEE then walked over to  
20 JACKSON, tapped him on the back, again gestured to the envelope, and said, "[t]ake that." JACKSON  
21 picked up the envelope. SENATOR YEE said that JACKSON would walk him to his car and return.

24 When KEITH JACKSON returned to the room, he advised the UCEs that SENATOR YEE was  
25 willing to move forward and be helpful, including arranging to set up a meeting with the legislator with  
26 whom UCE 4180 had requested a meeting. UCE 4180 stated that he was willing to make campaign  
27 donations for meetings that will help his agenda. JACKSON responded, "on that note..." and continued  
28

1 by saying that SENATOR YEE was asking for a little bit more; they were trying to reach \$45,000. UCE  
2 4180 said he understood, but added that they only had one meeting with someone of value.

3 During a telephone conversation on July 4, 2013, SENATOR YEE complained to KEITH  
4 JACKSON about UCE 4180 nickel and diming them, and that it was too close to pay to play.  
5 JACKSON asked whether they should just let UCE 4180 go. SENATOR YEE asked whether UCE 4599  
6 had produced any more checks. SENATOR YEE then told JACKSON that he should get his son  
7 [BRANDON JACKSON] to open a dispensary so that if UCE 4180 does what he says he wants to do in  
8 California, UCE 4180 could then buy out JACKSON's son. SENATOR YEE stated that \$20,000 to  
9 \$40,000 in campaign contributions is chump change when there is millions of dollars to make and invest  
10 in. SENATOR YEE concluded by telling JACKSON to tell UCE-4180, "[t]ime's ticking away, you  
11 know, I mean, we need to get the dollars now so that we can get those checks out man."  
12

13 On July 13, 2013, SENATOR YEE, KEITH JACKSON, UCE 4180, and UCE 3357 attended an  
14 event at which SENATOR YEE briefly introduced the UCEs to another legislator, referred to herein as  
15 Legislator 1.  
16

17 During a telephone conversation on July 15, 2013, SENATOR YEE complained to KEITH  
18 JACKSON that UCE 4180 came all the way out to California -- referring to the meeting on July 13 --  
19 and "he didn't give us anything," and "[t]hat's so wrong, man." The same day, JACKSON spoke with  
20 UCE 4180 and expressed frustration. UCE 4180 stated he was used to results and therefore, from this  
21 point forward, he would pay on a per-meeting basis.  
22

23 After KEITH JACKSON spoke with UCE 4180, he spoke with SENATOR YEE on the  
24 telephone. SENATOR YEE complained about all the time he wasted with UCE 4180 and said they  
25 should go their separate ways. JACKSON then stated that he also thought he was going to walk away  
26 from UCE 4180, to which SENATOR YEE told him to do what he needed to do. SENATOR YEE  
27 continued, "[i]t's just that, you know, the guy's just dragged, for all the stuff we've done, huh? What  
28

1 have we come up with, \$15,000? ... \$15,000 man, shit. For what we did man? Shit. You know, we got  
2 him close to uh, [State Senator 1]. We got him close to [Legislator 1].

3 On July 21, 2013, KEITH JACKSON told UCE 4180 that SENATOR YEE wanted to continue  
4 to work with UCE 4180, but that SENATOR YEE was concerned because UCE 4180 did not pay  
5 anything on his most recent trip to California. UCE 4180 pointed out that he has paid \$30,000 for one  
6 meeting and one introduction that did not count. JACKSON explained that SENATOR YEE did not  
7 want money every time UCE 4180 comes out to California, but UCE 4180 committed to \$50,000 and  
8 SENATOR YEE wanted to make sure "we get there." JACKSON stated if UCE 4180 gave \$25,000 in  
9 August, everyone would be happy.  
10

11 On August 26, 2013, UCE 4180, UCE 3357, SENATOR YEE and KEITH JACKSON met with  
12 State Senator 2 in Sacramento. SENATOR YEE introduced UCE 4180 and explained what UCE 4180's  
13 interests were. UCE 4180 also explained his interests. During the meeting, SENATOR YEE advocated  
14 for UCE 4180's position of heavy regulation of medical marijuana, saying at one point, if medical  
15 marijuana is going to become mainstream, "[y]ou've got to have those kind of barriers" that UCE-4180  
16 wants.  
17

18 On September 17, 2013, KEITH JACKSON met with UCE 4180 at the Marriott Marquis Hotel  
19 in San Francisco. JACKSON said that SENATOR YEE was upset because UCE 4180 had not paid for  
20 the meeting with State Senator 2. In response, UCE 4180 showed JACKSON \$10,000 cash which he  
21 said was for the meeting. UCE 4180 wanted to meet SENATOR YEE to pay him the money. UCE 4180  
22 told JACKSON that he also wanted to offer SENATOR YEE and JACKSON ownership in UCE 4180's  
23 medical marijuana business in exchange for introducing a new marijuana bill. UCE 4180 explained that  
24 the stock would be worthless without the bill being introduced and passed. JACKSON and UCE-4180  
25 then arranged to meet Senator YEE later that evening.  
26  
27  
28

On the evening of the same day, September 17, 2013, SENATOR YEE and KEITH JACKSON met with UCE 4180 at a restaurant in San Francisco's Chinatown. UCE 4180 told SENATOR YEE that he was paying for the meetings and handed an envelope with \$10,000 cash to JACKSON while telling SENATOR YEE that the playing field was now level (referring to the meeting with State Senator 2). UCE 4180 asked SENATOR YEE how much he would want to introduce marijuana legislation. SENATOR YEE said that he would have to think about the number. UCE 4180 proposed giving SENATOR YEE and JACKSON stock in his company for the legislation and that SENATOR YEE's stock would be in JACKSON's name. SENATOR YEE said he thought that UCE 4180 wanted SENATOR YEE to navigate the political landscape and not introduce legislation. SENATOR YEE described the legislation as a "heavy lift," and asked for time to think about it.

On December 18, 2013, UCE 4180 spoke to KEITH JACKSON on the phone. JACKSON told UCE 4180 that JACKSON had not forgotten about UCE 4180 and the legislative session was about to start up. JACKSON said, "we need to come up with some strategy" because a lot of things are moving and there will be some new "political people" in charge. UCE 4180 asked JACKSON why he had not heard from JACKSON or SENATOR YEE for several months and JACKSON responded that the issue with Senator Calderon had caused people to lay low.

### III. CONCLUSION

Based on the foregoing, I request that a Criminal Complaint issue for the Targets listed in Part B of Section I of this Affidavit, based upon Probable Cause as described in Section II of this Affidavit. In summary, as follows:

Defendant	Date	Offense	Penalty
SIU	April 12, 2011	18 USC 1956(a)(3)	Up to 20 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
NIEH	April 13, 2011	18 USC 1956(a)(3)	Up to 20 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
CHOW, NIEH	July 14, 2011	18 USC 1956(a)(3)	Up to 20 years prison; 3 years supervised release; \$250,000 fine;



1				\$100 assessment
2	CHOW, CHIU	August 1, 2011	18 USC 1956(a)(3)	Up to 20 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
3	CHOW, NIEH, JANE LIANG, TINA LIANG, TILTON	December 13, 2011 to March 9, 2012	18 USC 371, 2315, 2314	Up to 5 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
5	NIEH, CHANTHAVONG	February 14, 2012	21 USC 841, 846	Up to 5 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
7	CHOW, NIEH, PAU, YUN	May 22, 2012	18 USC 1956(a)(3)	Up to 20 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
8	CHOW, NIEH, MA, SO	September 8, 2012 to September 10, 2012	18 USC 371, 2315	Up to 5 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
10	NIEH, CHANTHAVONG, LI	September 26, 2012	18 USC 922(a)(1)	Up to 5 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
11	NIEH, CHANTHAVONG, LI	September 26, 2012	18 USC 922(g)(1)	Up to 10 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
13	NIEH, CHANTHAVONG	October 2, 2012	18 USC 922(a)(1)	Up to 5 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
14	NIEH, CHANTHAVONG	October 2, 2012	18 USC 922(g)(1)	Up to 10 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
16	CHANTHAVONG	October 24, 2012	21 USC 841(a)(1)(B)	From 5 to 40 years; 4 years supervised release; \$5,000,000 fine; \$100 assessment
17	CHANTHAVONG	October 24, 2012	18 USC 924(c)	From 5 years to life consecutive; 5 years supervised release; \$250,000 fine; \$100 assessment
19	MEI	October 30, 2012	21 USC 841(a)(1)(B)	From 5 to 40 years; 4 years supervised release; \$5,000,000 fine; \$100 assessment
20	CHANTHAVONG, LI	January 23, 2013	18 USC 922(a)(1)	Up to 5 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
22	CHANTHAVONG, LI	January 23, 2013	18 USC 922(g)(1)	Up to 10 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
23	LI, NHINGSAVATH, MASTRANGELO, CHOW	April 16, 2013 to April 17, 2013	18 USC 1956(a)(1)	Up to 20 years prison; 3 years supervised release; \$500,000 fine; \$100 assessment
25	KEITH JACKSON, BRANDON JACKSON, SULLIVAN	September 20, 2012 to March 26, 2014	21 USC 846	From 10 years to life prison; at least 5 years supervised release; \$10,000,000 fine; \$100 assessment
27	KEITH JACKSON, BRANDON JACKSON,	June 25, 2013	18 USC 922(a)(1)	Up to 5 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment



1	SULLIVAN			
2	CHOW, NIEH, PAU, YUN	July 18, 2013 to July 23, 2013	18 USC 371, 2315, 2342(a) and 2344	Up to 5 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
3	ROEUN	August 28, 2013	18 USC 1958	Up to 10 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
4	CHOW, NIEH, ELAINE LIANG, GEE	September 9, 2013 to September 12, 2013	18 USC 1956(a)(1)	Up to 20 years prison; 3 years supervised release; \$500,000 fine; \$100 assessment
5	LI, CHANTHAVONG	September 18, 2013	21 USC 846	Up to 5 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
6	ELAINE LIANG, GEE, CHEN, LAI	October 15, 2013 to October 16, 2013	18 USC 1956(a)(1)	Up to 20 years prison; 3 years supervised release; \$500,000 fine; \$100 assessment
7	CHEN, LAI, GEE, ELAINE LIANG, NIEH	December 5, 2013 to December 6, 2013	18 USC 1956(a)(1)	Up to 20 years prison; 3 years supervised release; \$500,000 fine; \$100 assessment
8	KEITH JACKSON, BRANDON JACKSON, SULLIVAN	December 13, 2013 to March 3, 2014	18 USC 1958	Up to 10 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
9	TINA LIANG, TILTON	February 20, 2014	21 USC 846	From 5 to 40 years; 4 years supervised release; \$5,000,000 fine; \$100 assessment
10	ROUEN	February 26, 2014	18 USC 922(a)(1)	Up to 5 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
11	LELAND YEE, KEITH JACKSON, LIM	August 5, 2013 to March 26, 2014	18 USC 371, 922(a)(1), 922(l)	Up to 5 years prison; 3 years supervised release; \$250,000 fine; \$100 assessment
12	LELAND YEE, KEITH JACKSON	September 26, 2012	18 USC 1343, 1346, 2	Up to 20 years in prison; 3 years supervised release; \$250,000 fine; \$100 special assessment
13	LELAND YEE, KEITH JACKSON	October 18, 2012	18 USC 1343, 1346, 2	Up to 20 years imprisonment; 3 years supervised release; \$250,000 fine; \$100 special assessment
14	LELAND YEE, KEITH JACKSON	October 18, 2012	18 USC 1343, 1346, 2	Up to 20 years imprisonment; 3 years supervised release; \$250,000 fine; \$100 special assessment
15	LELAND YEE, KEITH JACKSON	April 25, 2013	18 USC 1343, 1346, 2	Up to 20 years imprisonment; 3 years supervised release; \$250,000 fine; \$100 special assessment
16	LELAND YEE, KEITH JACKSON	May 1, 2013	18 USC 1343, 1346, 2	Up to 20 years imprisonment; 3 years supervised release; \$250,000 fine; \$100 special assessment
17	LELAND YEE, KEITH JACKSON	May 20, 2013	18 USC 1343, 1346, 2	Up to 20 years imprisonment; 3 years supervised release; \$250,000 fine; \$100 special assessment

1 Under penalty of perjury, I swear that the foregoing is true and correct to the best of my knowledge,  
2 information, and belief.

3  
4  
5 

6 Emmanuel V. Pascua  
7 Special Agent  
8 Federal Bureau of Investigation

9 SWORN BEFORE ME  
10 ON MARCH 23, 2014.

11 

12 HONORABLE NATHANAEL M. COUSINS  
13 UNITED STATES MAGISTRATE JUDGE

14 Approved as to form:

15 

16 William Frentzen  
17 Susan Badger  
18 Assistant United States Attorneys  
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